



Quality Assurance/Quality Control and Oversight Study

A report presented to the Grain Inspection, Packers and Stockyards Administration
of the United States Department of Agriculture.

John G. Surak, Ph.D.
Department of Food Science and Human Nutrition
Clemson University
Clemson, SC 29634

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EXECUTIVE SUMMARY

An examination of Grain Inspection, Packers and Stockyards Administration's current QA/QC and oversight program was conducted to determine if its methods and structure are effective, efficient, and appropriate. The study includes the following:

- ! A review of current practices, organizational structure, and technology used to ensure inspection uniformity nationwide.
- ! A determination of whether greater consolidation and centralization of oversight functions can improve GIPSA's program efficiencies.

Any recommendations must not unduly impact the high quality of service delivered to American agriculture.

In general, GIPSA does an adequate job of providing timely, consistent, and accurate services. However, industry does not feel that they are receiving value for the cost of the services. This indicates that the grain inspection process is ineffective.

To improve the efficiency of the system, a strategy needs to be developed and implemented that addresses five major issues:

- 1 Ensure that the entire grain inspection system, whether the government portion or the private portion, focuses on providing value to the customers. The components of value are:
 - ! Accuracy
 - ! Consistency
 - ! Timeliness
 - ! Cost.
- 2 Add competitive pressures to ensure the continued implementation of technical improvements that will better meet current and future customer needs; and reduce operational costs.
- 3 Utilize existing technology to the fullest extent.
- 4 Ensure that all analytical procedures maximize consumer value.
- 5 Ensure that all procedures meet the following two criteria:
 - ! Stable, or measurement variation is predictable.
 - ! Capable, or the measurement variation is operating within defined limits.

This can be done by utilizing technologies better. The following recommendations are to be used in their entirety:

- ! Calibration of inspectors needs to be separated from the interpretation of line grades.
- ! Implement a method to calibrate inspectors.
- ! Utilize automated data collection procedures to capture data as it is being generated at official agencies and GIPSA.
- ! Eliminate the retesting factors under certain defined conditions.
- ! Use process control techniques to monitor performance of inspectors and equipment.
- ! Implement the use of alternative picking procedures, such as reduced sample size or throw samples, under defined circumstances.
- ! Utilize web-based communications to reduce the time for appeals and opinions.

If the system is improved, significant changes can be made to the structure of the grain inspection process. These changes include:

- ! Eliminate boundaries for official agencies.
- ! Eliminate non-exporting testing by GIPSA.
- ! Centralize analysis of supervision at the Technical Service Division. The Board of Appeals and Review would continue to report to TSD as long as the BAR provides timely, accurate, and consistent results to the grain inspection process.
- ! Reduce the number of personnel at the field offices and slightly increase the number of personnel at TSD.
- ! Redefine the responsibilities of the Field Office Manager (FOM).
- ! Develop a system to provide back-up to the FOM when the FOM is not readily available to answer questions. This can be accomplished through Assistant Field Office Managers (AFOM).
- ! Locate two AFOMs at both Portland and New Orleans and set work hours to ensure back-up coverage from 6 AM to 9 AM Eastern time.

GIPSA must develop a strong strategy to meet future needs of U.S. agriculture and to increase the value of the grain inspection process. Potential new service areas include:

- ! Further enhancement of electronic transmission of test results.
- ! Develop and market Identity Preservation (IP) of grain through the entire distribution process.
- ! Facilitate marketing of custom grains to meet specific functional needs.
- ! Develop innovative concepts to market grain. One concept is to develop strategies to provide foreign suppliers with smaller lots of grain. This would allow the U.S. to sell grain overseas in a just-in-time manner.
- ! Facilitate improved communications between parties involved in grain shipments.

GIPSA Quality ASSURANCE/QUALITY CONTROL AND OVERSIGHT

I. INTRODUCTION

The Grain Inspection, Packers and Stockyards Administration (GIPSA) provides official grain inspection and weighing services to American agriculture. This is done under the authority of the United States Grain Standards Act. Grain inspection can be divided into two parts: (1) export inspection and (2) interior inspection. Grain inspection services are provided on a user fee basis.

All grain that is exported from the United States must be inspected through the official grain inspection process. Federal statute requires that this must be done either by GIPSA employees or by State agencies with delegated authority by GIPSA.

Grain that is traded within the U.S. may or may not be inspected by the official grain inspection process. The primary reasons for inspecting grain within the interior include:

- ! A customer or a financial agency demands an official grain inspection certificate as part of a grain transaction.
- ! The agribusiness desires to have an official inspection, prior to shipping the grain to an export location.
- ! Inter-company barge grain that is received at export port locations.

Currently, the official agencies (OA) inspect approximately 30% of the grain sold within the domestic market (Table 1). The interior grain inspection service is provided either by delegated State agencies, designated private agencies, or GIPSA.

Table 1 Market share of grain that is officially inspected

Fiscal year	1999	2000	2001
Metric tons of grain produced	423.8	406.6	418.0
Metric tons of grain inspected at interior official agencies	127.3	128.3	128.6
Market share of domestic inspections	30.0%	31.6%	30.8%

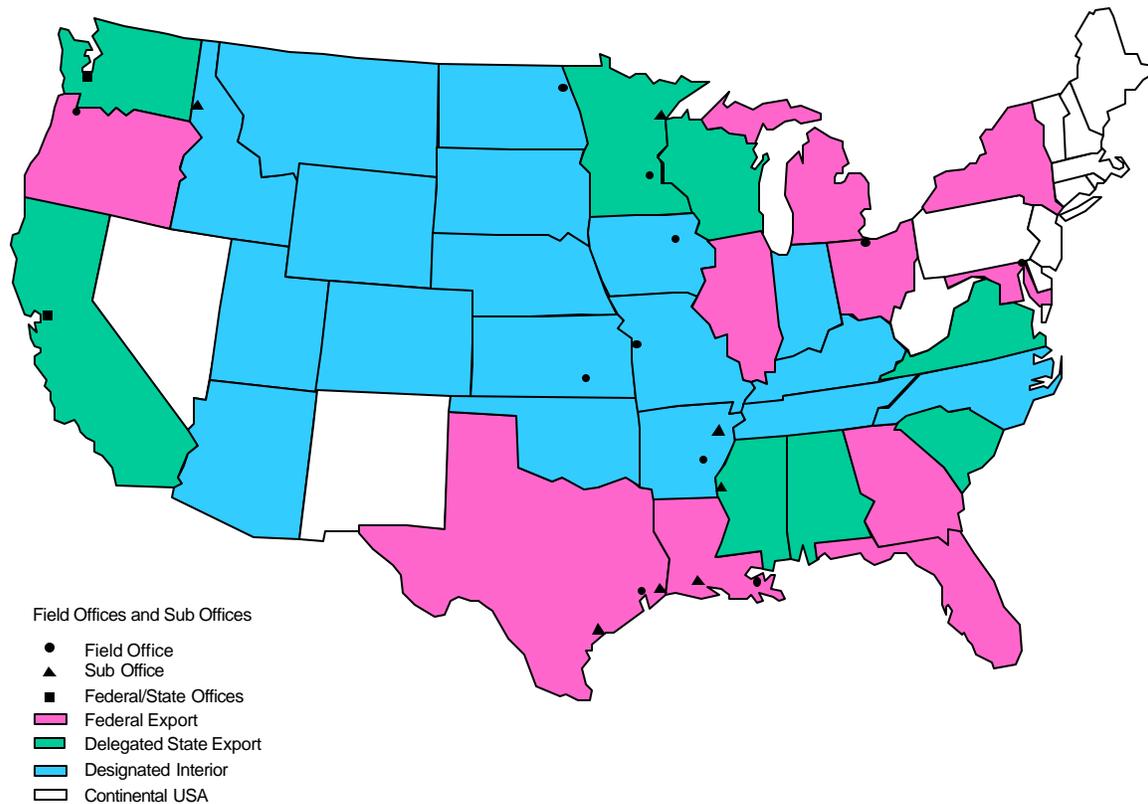
GIPSA is also responsible for providing official inspection services covering rice, pulses, legumes, and processed products under authority of the Agricultural Marketing Act of 1946. All of these services are provided either by GIPSA personnel, independent contractors, or authorized State agencies.

Federal statutes require that GIPSA monitor and provide oversight of all service providers. GIPSA's current oversight program consists of three basic components:

- ! QA/QC of grading and testing processes by field offices and TSD,
- ! Supervision of the State and private official agencies by field offices,
- ! Reviews/audits of field offices and official agencies by the Compliance Division.

QA/QC – The GIPSA Quality Assurance and Quality Control Handbook provides a detailed explanation of the QA/QC process. For subjective grading factors, the Board of Appeals and Review (BAR) (a panel of expert grain inspectors stationed at the TSD, Kansas City, KS,) serves as the standard reference for each factor. The BAR communicates the subjective line for each factor to 17 GIPSA Quality Assurance Specialists (QAS) located in 12 GIPSA offices and 2 Federal/State offices throughout the country (Figure 1) through the use of sample exchange, written directives, and visual aids.

Figure 1. GIPSA Grain Inspection Program

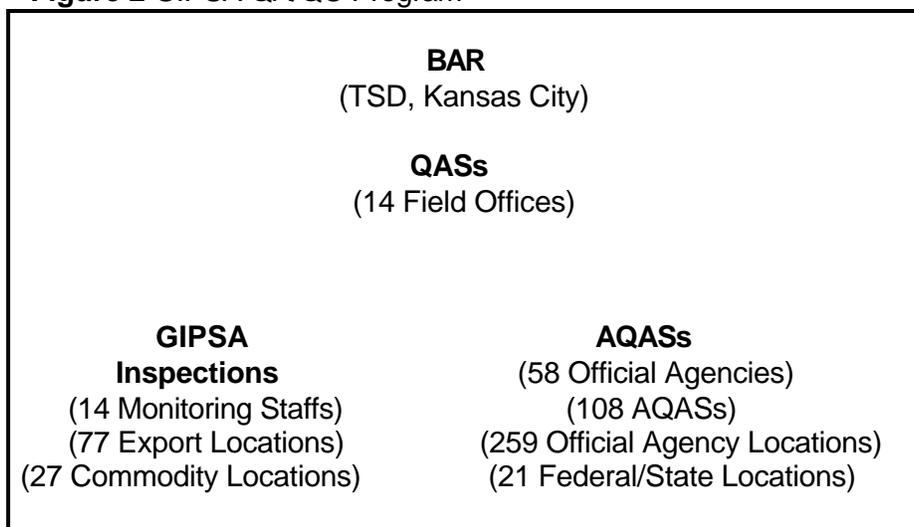


These 17 QASs communicate the subjective line to all GIPSA line inspectors and to the Agency Quality Assurance Specialists (AQAS) employed by the State and private laboratories. The AQASs, in turn, communicate the standard line to field inspectors employed by the State and private laboratories. Communicating the subjective factor information to the front-line inspector varies. Methods used depend on the complexity and size of the GIPSA export office or State and private agency. Monitoring the official inspection system involves the use of various quality control tools. Figure 2 shows the relation of the BAR to the official agencies with respect to the QA/AC program.

Compilation and analysis of the quality control data occurs at the field office levels, the BAR and Field Management Division (FMD) headquarters. This is accomplished through the use of a GIPSA developed QA/QC software program. The field offices are responsible for analyzing the data on an individual inspector basis while headquarters review the data typically at the official agency or field office level.

Monitoring objective testing factors varies based on the nature and capabilities of the equipment being monitored. The official inspection system contains approximately 4,700 pieces of equipment that require monitoring.

Figure 2 GIPSA QA/QC Program



Simple equipment, such as sampling probes and laboratory scales, are examined or tested at the local laboratory with checktesting procedure records maintained at the local laboratory and field office.

More complex equipment, such as dockage testers and test weight per bushel apparatuses, are monitored with check samples tested on standard instruments. This procedure involves TSD preparing samples from the GIPSA master instrument to check each field office's master instrument. Each field office prepares different samples from its master instrument to checktest all field instruments in their circuit. A layering of tolerances occurs with this procedure.

GIPSA's most sophisticated instruments are monitored directly by TSD without field office involvement. These are typically instruments with microprocessors containing self-diagnostic programs. GIPSA is replacing its existing less sophisticated testing equipment with these instruments as testing technology evolves.

Each of these checktesting procedures is bolstered by the sample exchanges program for subjective factors.

Supervision - Fourteen GIPSA field offices are responsible for the ongoing supervision of both GIPSA service points and official agencies. These supervision activities include, but are not limited to, ensuring that internal official agency quality control processes are followed, clarifying GIPSA policies and procedures, assisting to trouble shoot technical or service delivery problems, enforcing the regulations and USGSA, and a general first-hand understanding of the local needs of the official agencies customers.

Compliance Reviews and Audits - The Compliance Division is responsible for the review/audit of all field offices on a scheduled basis and each official agency at least once during their 3-year designation period. The audit includes a review of ongoing QA/QC and supervision results from the local Field office as well as a review of the official agencies operations. These official agency audits serve as the primary basis for whether GIPSA redesignates an agency upon termination of the 3-year designation period.

II. RESEARCH OBJECTIVES

An examination of GIPSA's current QA/QC and oversight program was conducted to determine if its methods and structure are effective, efficient and appropriate. The study includes the following:

- ! A review of current practices, organizational structure, and technology used to ensure inspection uniformity nationwide.
- ! A determination of whether greater consolidation and centralization of oversight functions can improve GIPSA's program efficiencies.

Any recommendations must not unduly impact the high quality of service delivered to American agriculture.

III. RESEARCH METHODOLOGY

The effectiveness of GIPSA's QA/QC and oversight program was determined using surveys, interviews, and assessment of processes at selected GIPSA locations.

Research was conducted in compliance with Federal guidelines for human subject research. Clemson University Institutional Review Board approved the research protocol. This protocol ensures that the participants and their responses cannot be identified directly or indirectly.

The survey asked the participants to respond to a number of issues using a five-point scale where "one" was strongly disagree and "five" was strongly agree. For reporting purposes, data were aggregated with other appropriate cohorts into groups of at least five datum points.

The survey and interview determined the following:

- ! Identify what must be controlled to ensure services are performed well.
- ! Determine the effectiveness of control measures.
- ! Determine what must be done to provide better oversight.
- ! Identify changes in the marketplace.
- ! Determine what must be done to meet future marketplace needs.
- ! Identify roadblocks that inhibit personnel from doing the best job.
- ! identify potential sources of waste.

The survey and interview was administered to GIPSA personnel at the following locations:

GIPSA headquarters in Washington, DC.

GIPSA co-headquarters in Kansas City, KS.

Designated and delegated official agencies and GIPSA field offices in the following locations:

Wichita, KS.

New Orleans, LA.

Cedar Rapids, IA.

Portland, OR.

All other GIPSA field offices, and designated and delegated official agencies were given the opportunity to respond through a mailed survey.

Meetings were conducted with external customers in New Orleans, Portland, and Cedar Rapids. GIPSA customers were interviewed to determine the following:

- ! Determine the quality consistency and accuracy of services provided by GIPSA.
- ! Identify what services are done well.
- ! Determine what services need improving.
- ! Determine changes in the marketplace.
- ! Determine what GIPSA can do to meet future needs.

IV. RESULTS, OBSERVATIONS AND ASSESSMENTS

General results

One hundred percent of the field office managers and QASs responded to the survey, and 65 percent of the official agency managers responded to the survey. The survey questions and the quantitative results are presented in Appendix A for the following aggregated groups:

DC	Washington, DC headquarters personnel
KCC	Kansas City, KS co-headquarters and TSD personnel
FO MGT	Field office managers and QAS
FO NON MGT	Field office personnel excluding the FOM and QAS
OA	Official Agency managers.

Appendix B shows the Box Plots of the same data. The boxes indicate the number of responses within the second and third quartile, the whiskers indicate the number of responses within the first and fourth quartile, and outlier values are marked with a star (“”).

Appendix C provides comments collected during the administration of the survey. Care must be used in interpreting the comments since not all of the participants elected to write comments.

The following rule of thumb can be used to interpret survey results: “If a response is measured using a five-point scale, and the organization is operating in a competitive marketplace, then the organization must receive mean scores of greater than 4.0 to be assured repeat sales.”

More than 80 percent of the responses had mean scores between 3.0 and 4.0. Therefore, both the Federal and private sections of official grain inspection are doing a good job, but not an excellent job, in meeting customer needs. In addition, the problem appears to be linked to system ineffectiveness rather than specific causes. The survey was not able to identify any other significant trends.

This research confirms other GIPSA studies that the official grain inspection process is highly effective. This is a direct result from having a workforce in both the public and private sectors that is highly professional and experienced. An extensive (and somewhat complex) process is used to control and assure that subjective test results are accurate and consistent. This system relies on the licensing of inspectors and the evaluation of various types of samples by the BAR and field office QAS personnel. The communication of the grading factors and the communication of the subjective line for each factor from the BAR through the field offices to the official agencies may lead to an actual or a perceived stacking of tolerances.

The BAR issues a consensus opinion on any specific interpretation of a grain sample. The opinion is partially dependent on the BAR members present who participated in developing the opinion. There were stories the BAR would issue significantly different opinions when a blind sample was submitted to the BAR at two different times. This may be one of the causes for complaints that

the grade line shifts.

Approximately 44,000 samples are analyzed by GIPSA per year as part of the QA/QC program. Data generated by this system are statistically analyzed. Field office QAS and the official agency AQAS personnel use this information to provide feedback and coaching to line inspectors. In addition, these data are valuable in monitoring the subjective analysis process. It is used to determine if chronic problems are occurring that affect accuracy and precision, such as grade shaving.

The number of samples taken for supervision is based on a percentage. Statistical theory states that samples size should be based on the variation present in a process rather than a fixed percent.

When this feedback is used for coaching inspectors, information is not generated in a timely manner. One official agency reported that feedback on inspector performance was received four to six weeks after the supervision samples were submitted.

Questions were raised on the typical source of errors that a licensed inspector would make during grading. Most of problems centered on the inspector having a bad day or just “blowing” a sample. Further investigation revealed that on any single day at a single location most of the samples were reasonably consistent with regard to the amount of any grading factor.

The commercial food processing industry uses a form of subjective analysis when evaluating food product’s sensory properties. A review of the scientific literature revealed that no QA/QC procedures have been published for sensory evaluation. One author acknowledged the need for developing procedures to ensure the accuracy and consistency of the sensory evaluation process.

In addition, interviews confirmed that the following criteria are important (or constitute value) to the customers of the official grain inspection process:

- ! Timeliness
- ! Accuracy
- ! Consistency
- ! Cost.

All parts of the grain inspection process must focus their efforts on providing services that meet these requirements. If this is not done, there can be further erosion of the market share on the permissive side of grain inspection. In addition, it is critical that the members of the official grain inspection process understand what the customer exactly wants with respect to the desired level of timeliness, accuracy and consistency. For example, there are times when the customer considers timeliness more important than accuracy.

TSD

Currently, TSD is developing a series of digital images that will be used to make reference prints for official agencies. The image quality of the pictures is excellent and may be used for other purposes in the grain inspection process.

Field Offices

There were mixed results on the value of services provided by field offices. In general, the number of positive comments were in direct proportion to the proximity of the field office to the official agencies. The closer an official agency was to the field office, the more the official agency commented that the field office provided a valuable service.

It appears that the field office plays a positive role in the grain inspection process. This is in the area of "personal touch," such as showing concern for the grading process and coaching inspectors. Numerous comments were made by interior field office personnel about the lack of resources available to cover travel expenses to visit official agencies. This has resulted in a decrease in the amount of travel to official agencies.

Appeals

Comments were made that appeals should go directly to the BAR, which is the final authority in grading samples.

Data gathering

During the grain grading process, data are collected using the following procedure:

- ! The results from the analytical instruments, such as moisture meters, protein testers, and analytical balances, are recorded on a pan ticket.
- ! The results from the pan ticket are entered into the computer. The computer is then used to prepare the official certificates and to report data to the National Quality Database.

The process is inefficient and allows for transcription errors to occur in two places:

- ! Reading the instrument and recording the data on the pan ticket.
- ! Entering of the results into the computer.

Further investigation revealed that the electronic balances, protein tester, and moisture meter have RS-232 ports. The RS-232 ports allow the instrument to be directly interfaced to a computer. This permits the development of a system to directly capture the analytical data without transcription of information to paper pan tickets.

Competition

The official grain inspection system is a legal monopoly. Legal monopolies have a place in a capitalistic market. However, the monopolies do not experience competitive pressures. Thus, the monopolies may be slow to adapt to marketplace needs. When this occurs, there is a net loss to the nation's economy, thus, hurting all citizens.

Competitive pressures are not negative. They drive innovation which in turn drives the creation of wealth for this nation. Russell Roberts' book, "The Choice: A Fable of Free Trade and Protectionism," Prentice Hall, Upper Saddle River, NJ, 2001, describes the importance of competitive pressures for our economy and what happens when competitive pressures are removed.

Marketplace issues

In a recent survey, 2300 customers were asked whether they were satisfied or dissatisfied with the services provided by the official grain inspection process. The return rate for the survey was 50 percent. Table 2 summarizes critical results of the survey. The findings of this research are consistent with the findings of the Year 2000 customer survey.

Table 2 Summary of GIPSA 2000 survey of customers of the official grain inspection process

Question	Service provider			
	Private Official Agencies	State Official Agencies	FGIS Office	All
I receive results in a timely manner	91%	88%	94%	81%
Official results are accurate	89%	85%	90%	81%
Official results are consistent	81%	83%	77%	80%
The overall quality of the service is satisfactory	89%	88%	88%	85%
Service is a good value for the cost	63%	65%	67%	64%

Since the permissive portion of the grain inspection process inspects only 30 percent of the grain in the U.S., the grain inspection system is not efficient and is not providing value to U.S. agriculture.

Logistics

Numerous comments were made on problems with the logistics and transportation of grain. The arrival time of unit trains to an elevator could be guaranteed to approximately 15 hours. This caused problems in scheduling for the elevator and the organizations performing original inspections. In the era of global positioning systems, it appeared that the root cause was lack of real-time communications and politics between companies involved in grain shipments.

Functional Tests

The end users of grain are changing their purchasing requirements. These consumers are purchasing grain that has specific functional properties rather than purchasing on traditional grades. This change in the market will increase the need for added functional tests for grain.

Marketing Opportunity

Discussions with customers of the grain inspection process revealed an international marketing opportunity for U.S. grain exists. The U.S. has a competitive advantage in international grain trade. The U.S. can source custom grains for international customers. In addition, it is possible to reduce the lot size on a grain ship. The U.S. should use this advantage to market small lots of custom grains, thus, providing international customers with just-in-time shipment products.

Structure for Official Inspection

There is a simple rule of thumb regarding the structure of a system -- "Form follows function." An organization's structure must be able to deliver the required services in an efficient manner. Usually, the current structure of an organization is the most efficient structure for the presently defined system. If changes are made to the structure without changing the system, additional inefficiencies will be added to the system, thus, increasing costs for the customer.

If improvements are made to the form of the system, then it is possible to change the structure. The changes in efficiencies can be used to provide increased value to the customers of the grain inspection process.

V. CONCLUSIONS

The current system for official grain inspection is effective. GIPSA's surveys of customers of the official grain inspection process generally are pleased with the technical aspects. However, the customers expressed dissatisfaction with the cost of the inspection process as it relates to the value provided. Thus, changes are needed in the system to improve efficiency.

A strategy needs to be developed and implemented that will improve the system. This strategy must address five major issues.

- 1 Ensure that the entire grain inspection system, whether the government portion or the private portion, focuses on providing value to the customers. The components of value are:
 - ! Accuracy
 - ! Consistency
 - ! Timeliness
 - ! Cost.
- 2 Add competitive economic pressures to ensure the continued implementation of technical improvements that will better meet current and future customer needs; and reduce operational costs.
- 3 Utilize existing technology to the fullest extent.
- 4 Ensure that all analytical procedures maximize consumer value.
- 5 Ensure that all procedures meet the following two criteria:
 - ! Stable, or measurement variation is predictable.
 - ! Capable, or the measurement variation is operating within defined limits.

VI. RECOMMENDATIONS

The recommendations in Section VII. are to be used in their entirety. The objective is to increase the system's effectiveness. Therefore, each recommendation **IS NOT** an independent recommendation. They interconnect and redefine the system. This redefinition will allow for a change in the structure.

The recommendations are based on not increasing the number of samples that are analyzed as part of the QA/QC program. For example, it is estimated that there are approximately 600 active inspectors employed by official agencies. If one sample is submitted per inspector per week, then a total of 30,000 supervision samples would need to be analyzed per year. Currently, GIPSA analyzes 44,000 supervision samples per year. As data are gathered following the changes in the QA/QC program, it may be possible to actually reduce the number of samples that are collected as part of the new supervision process. This can be achieved by using the National Quality Database for monitoring the performance of inspectors and equipment.

VII. SPECIFIC RECOMMENDATIONS

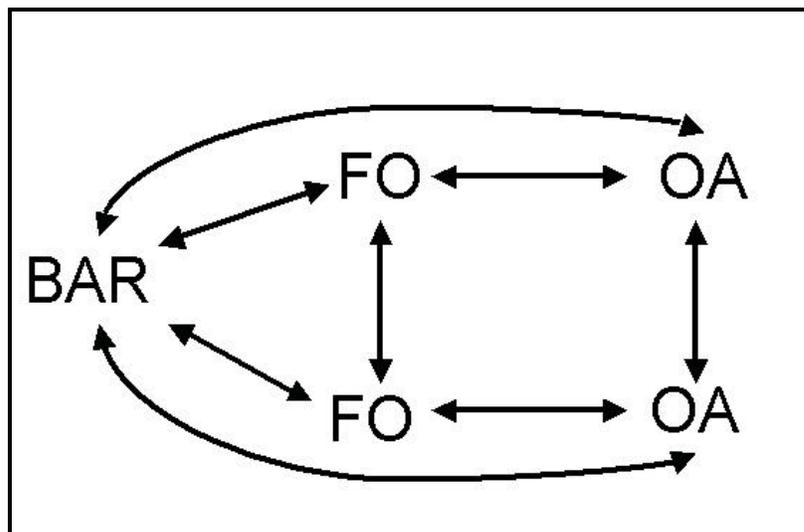
Better Utilize Existing Technologies

Calibrate inspectors and ensure inspector competency

The current process used for subjective measurements does not have an independent calibration process. This process links calibration to interpretation of the line through samples sent to the BAR. Calibration is a separate process and should not be linked to interpretation of the line.

All personnel who grade grain in the official grain grading process should take an identical calibration test. This procedure would allow all personnel (whether BAR members or inspectors in the field) to be calibrated against each other. The ultimate objective is to eliminate either the perceived or actual stacking of tolerances. Figure 4 shows a graphical rendition of the calibration process. This calibration objective can be achieved using an electronic calibration test.

Figure 4 Graphical rendition of the subjective analysis calibration process



At the present time, TSD personnel are creating digitized images of various grain defects. These images can serve multiple functions in the grain inspection grading process as follows:

- ! The images can be used to develop an electronic reference library of grain defects.
- ! The images can be used to provide training if the early alert program uncovers a problem in a given region.
- ! The images can be used to provide training if an inspector is weak in grading a specific grain factor.
- ! The images can be used to calibrate all individuals currently grading grain.

Using the last concept, a sample of grain can be formulated for electronic picking.

First, the BAR would initially determine if specific pictures represented grains that either met the grade line or failed the grade line. These pictures would be the basis to developing an electronic grain sample. If the early alert program identified a potential problem in a region, pictures of that type of damage could be added to the test to ensure the inspector is competent to grade that type of damage.

An electronic sample could then be “picked” on the computer. The inspector would determine if the grain either met or did not meet the criteria of the line. All inspectors who currently grade grain could take an identical calibration test.

A number of grain slides would be selected that represent a typical grain sample with a specific level of damage. The level and types of damage could vary depending on the quality of grain present in the market.

The color of the electronic grain samples can be assured through the use of a device designed to calibrate the color of the monitor.

Depending on the sophistication of the program, the inspectors could be presented with either one grain at a time or all of the grain at one time. The inspector would then electronically sort through the grain in a predetermined amount of time. Picking can be simulated by using a mouse, by pointing to the image, and by left clicking for good grain and right clicking for bad grain.

It would be possible to assess the number of correct answers, the number of times the inspector classified a good piece of grain bad, and the number of times the inspector graded a bad piece of grain good. All personnel who currently grade grain would be required to maintain a specific degree of proficiency. If the level of proficiency is not maintained, the person would be required to participate in remedial training to correct the problem.

Automatic data collection

The amount of manual data entry into the National Quality Database can be reduced by doing the following:

- ! Interface existing analytical equipment (balances, protein meter, and moisture tester) to a computer to automatically collect analytical results.
- ! Provide direct computer entry of data where an instrument cannot be directly interfaced with the computer such as collecting data from StarLink, aflatoxin, or falling number tests.
- ! Utilize bar code readers or pull down menus for input of information such as inspector, dockage tester number, sample lot number, or method used for subjective analysis.

Benefits using automatic data entry include:

- ! Reduce transcription errors from equipment to pan tickets.
- ! Reduce transcription errors from pan tickets to the computer.
- ! Enable rapid electronic transmission of test results to customers.
- ! Enable rapid electronic transmission of test results into the National Quality Database for process control analysis.
- ! Enhance use to the National Quality Database to monitor processes at official agencies using process control techniques.
- ! Reduce operational costs by eliminating non-value added redundant work.
- ! Collect real-time results from supervision and other QA/QC samples, thus increasing the use of this data to predict potential problems.

Process control and ensure analytical proficiency

Process control can provide a powerful economic tool to monitor both subjective and non-subjective analyses. These techniques can be used to ensure process stability. Process control can be achieved in the following manner:

- ! Automatic data collection.
- ! Enhancement of the data collected into the National Quality Database.
- ! Appropriate real-time analysis of data using techniques available in the SAS program.

A system can provide the inspector with the tools to monitor his or her own process in real-time. A computer can be used to analyze the data in real time using trend analysis and control charts, results in real time, thus detecting if aberrant data were generated. If a datum point is aberrant, the computer can send a warning to the inspector asking for more information such as:

- ! Has a mistake been made in analysis? Do you need to retest the sample?
- ! Is this sample really aberrant? Do you want to accept the datum point?

The inspector can then decide whether he/she wants to accept the value or immediately retest the sample.

This same system will allow the official agency and the field office to monitor the analytical procedures and to make rapid corrections if a problem exists. In addition, this system will provide a more effective use of data generated during the collection of supervision samples. Supervision samples can be gathered to focus on specific issues such as:

- ! Potential instrument bias.
- ! Improper selection of an alternative picking process by an inspector.
- ! Problems with grading certain specific factors or grains by an inspector.

Supervision samples could be selected so that every inspector is tested at least once per week and every dockage tester, moisture meter, and protein tester is tested at least once a week. This strategy eliminates the current problem of finding samples that have a high percentage of damage in good years. In addition, a properly designed strategy can reduce the number of check samples needed to maintain a calibrated process.

Increase the number of analytical procedures available for picking samples

Currently, the picking of samples is done using a single standardized procedure for each grain. This ensures an accurate quantization of damage. There are times when the customer may value timeliness of results over accuracy in estimating the amount of damage. An example can occur when inspecting a unit train which contains a single grade of grain and the actual level of damage is in the center of the grade limits. Inspectors should

have the option of estimating the amount of damage by either using a reduced sample size for picking or using a “throw sample” to eye-ball estimate the level of damage. These methods can be done after the first sample is picked using the standard method. Inspectors using an alternative method can record the method used to analyze the sample. All alternative methods would have to be validated and approved. In addition, these procedures would need to be calibrated and monitored using the QA/QC process to ensure that the analytical processes are stable and capable. Initially, an increased level of monitoring of the alternative methods would be needed until confidence and experience is gained in the field.

Web-based communications

The web can be used for real-time communications on picking of samples between the official agency and either the field office or the BAR. This can be accomplished using web camera and transmission of live pictures. Web cameras could provide the first level of appeal or provide a method for getting an initial opinion for a sample. This process would not eliminate the option of sending appeals or opinions to the BAR.

For example, if there is a question regarding the picking of a sample, the pictures of the picking process can be immediately sent to an expert and an initial decision can be made regarding whether the sample was properly picked or the question answered. In addition, over-the-shoulder supervision can be conducted by the FOM at locations distant from the official agency. The ability of doing web-based monitoring would not eliminate the need of GIPSA conducting regular site visits to the official agencies.

In addition, the web can be used to communicate valuable information to GIPSA and to its customers. For example, a system can be developed that provides the following information on a web site:

- ! Grade and levels of quality attributes of a specific lot.
- ! Location of the lot in the distribution system.

This information would be of value in monitoring lots for identity preservation (IP).

Multiple testing of the same lot

GIPSA should consider eliminating the retesting factors in a specific lot when the following criteria have been met:

- ! An official certificate (white) has been issued for a lot.
- ! The specific factor does not change during a reasonable shipping time.
- ! IP can be guaranteed.

Needless retesting of a lot of grain adds cost and does not add perceived value to the consumer.

Structure for Official Inspection

Eliminate non-export testing by GIPSA

GIPSA should eliminate the non-export testing of grains. AMA grading could be contracted to properly selected independent contractors. In addition, a properly selected independent contractor could be used for grading inbound grain at export locations. This would eliminate the FGIS boundary for inbound shipments at port locations, thus allowing market forces to increase efficiencies and innovation.

Eliminate boundaries

Official agencies should not be limited to providing service to a specific boundary. This can be accomplished using the following strategy:

- ! Elimination of all boundary requirements for official agencies.
- ! Establish a maximum unified fee structure an official agency could charge for services.
- ! Permit official agencies to negotiate a price for services that is either equal to or less than the maximum fee.

The official agencies would no longer be guaranteed a monopoly to conduct business in a physically defined area. Official agencies would be able to solicit business anywhere in the U.S. In addition, the official agency could negotiate a price for the services that would be equal to or less than a maximum price set by GIPSA.

The official grain inspection system is a fee for service of the Federal government. Thus, this service must be available to all citizens. After eliminating boundaries, official agencies will be required to provide service to anyone requesting service at a price that cannot exceed the GIPSA set-analysis cost and any appropriate travel costs. If an official agency refuses to provide appropriate services to a customer, the agency would be in jeopardy of losing official status after due process.

Management theory states that suppliers should have as a minimum of four or five customers. These figures have been established so that the suppliers do not become overly dependent on a single customer or cannot be improperly influenced by a single customer. If, during the elimination of boundaries an official agency has greater than 25percent of income generated from a single site, there would be an increase in the level of surveillance. This cost for the increased level of surveillance would be borne by the official agency.

Reorganize TSD functions

TSD's primary role in oversight would be to provide calibration services and to analyze samples. They would report the results of the supervision samples into the National Quality Database. TSD would have a secondary role in the analysis of process control data generated from the National Quality Database. Therefore, TSD would support the responsibilities of the FOM. (FMD's primary responsibility in oversight is QA/QC and field office operations. As part of these responsibilities, FMD would select supervision samples, and analyze and interpret data from the National Quality Database.)

This change in responsibilities would allow for a change in staffing. It is estimated that the increase sample load at TSD can be accomplished with 8 full-time equivalents for analysis of supervision samples. (This estimate is based on one person picking three samples per hour, or 20 samples per day. Assuming a work year of 48 weeks, a person should be able to pick 4800 samples per year. The current workload for supervision and proficiency samples is 44,000 per year).

The TSD also would be responsible for preparing all calibration samples for the dockage tester.

BAR

There were suggestions that the BAR report to FMD rather than TSD. The current reporting structure for the BAR is acceptable as long as there is a strong commitment to ensure value is provided to the customers. This includes providing results in a timely manner. If this cannot be done, the BAR should report directly to FMD.

Calibration Services

Calibration services should remain in TSD as long as there is a strong commitment to ensure that value is provided to the customers. This included providing results in a timely manner. If this cannot be done, calibration services should report to FMD directly.

Reorganize Field Office functions

The FMD's primary responsibility in oversight is QA/QC and field office operations. As part of these responsibilities, FMD would select supervision samples, and analyze and interpret data from the National Quality Database.

With the automated collection of data and the use of process control techniques, it would be possible to reduce the size and change the responsibilities, of the field offices. The field office would have the following responsibilities:

- ! Regularly visit all official agencies in the circuit and observe analytical practices.
- ! Conduct over-the-shoulder supervision of the picking of samples using a combination of both observing the inspector in person and via the web.
- ! Serve as a technical resource to the official agencies in the circuit.
- ! Conduct training sessions at official agencies.
- ! Serve as a conduit of information between GIPSA and the official agencies.
- ! Meet with customers of GIPSA to assess the quality of service and identify future needs.
- ! Serve as an integral part of the early alert program.
- ! Monitor the process control data of analytical procedures using the National Quality Database. This monitoring would ensure that the analytical processes are both stable and capable.
- ! Provide guidance to TSD on the selection of samples for supervision.

The size of the circuit would be a function of both the number of official agencies and the distance that must be traveled.

This change, plus a shifting of the routine analysis of samples to TSD, would reduce the staffing of interior field offices to a staff of one person, the FOM.

At the ports, the current activities would be separated into two parts:

- ! Government Original Service Providers (the section providing original inspection).
- ! Field office (the section providing oversight and supervision).

The Government Original Service Providers would have responsibilities similar to official agencies. This would allow the structuring and staffing similar to official agencies. The units would have a manager and AQASs.

The port field offices would have responsibilities similar to the interior field offices and provide supervision and oversight. This would allow for the reduction of the number of GIPSA personnel assigned oversight and supervision responsibilities at ports to one person with two exceptions. At New Orleans and Portland, the number of personnel assigned oversight and supervision would be three -- an FOM and two assistant FOMs.

The AFOMs would provide technical back-up to the FOMs across the nation. This would allow for the timely response to questions when a FOM was not readily available at either an interior or port location. They could assist FOMs in providing training. In addition, they could help ensure proper succession of FOMs. The staffing for AFOMs could be structured in a way to ensure coverage of these activities from 6 AM to 9 PM Eastern Time.

Future Needs

A strong strategy needs to be developed to meet future needs of U.S. agriculture. Areas where projects have been identified include:

- ! Reduce the operational costs for the official grain inspection process.
- ! Increase value to customers, such as further enhancement of electronic transmission of test results.
- ! IP of grain through the entire distribution process.
- ! Enhance the marketing of grain. One area is to develop strategies to provide foreign suppliers with smaller lots of grain that allows the U.S. to sell grain internationally in a just-in-time manner.
- ! Market custom grains to meet specific functional needs.
- ! Develop more functional tests that predict the ability of a grain to meet customer needs.
- ! Facilitate communications between various segments of the grain industry, especially in the areas of logistics and transportation with the objective to increase the efficiency in moving grain both domestically and internationally.

All projects that GIPSA implements with regard to grain inspection should focus on adding value for the end consumer of the grain inspection process.

**APPENDIX A
QUESTIONS AND RESPONSES**

Table A1

Question No.	Question	DC		KCC		FO MTG		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
General Aspects											
1	People who work in this organization share its mission and goals and regard themselves as members of a team committed to achieving them.	3.9	0.3	3.5	0.9	3.8	0.7			4.1	1.0
2	In our unit, managers are the first to practice what they preach.	4.0	0.7	3.7	1.1	3.6	1.0			4.1	1.0
3	Managers in our unit are open to dialogue with staff and listen to them.	4.3	0.8	3.8	0.9	3.8	1.0			4.5	0.7
4	Our supervisors are only interested in results. How we obtain them and the effort involved isn't their concern.	2.1	0.9	1.9	1.0	2.3	1.2			1.9	1.3
5	We are always encouraged to take on greater responsibility and are given the tools to do so.	3.7	0.7	3.5	0.7	3.4	0.9			3.7	1.0
6	In our unit, there is a climate of trust between the supervisor and staff.	4.5	0.5	3.4	1.0	3.4	1.2			4.1	1.1
7	Respect for the individual, whatever his or her level, is a firm rule in our Agency.	4.0	0.9	3.6	1.1	3.5	1.1			4.2	0.9
8	In our unit, everyone is expected to offer concrete suggestions for improvement of any kind.	4.3	0.8	3.5	0.9	3.6	0.9			3.9	1.0
9	Information reaches interested parties quickly and directly without any bureaucratic complications.	3.4	0.8	2.5	1.0	2.9	1.2			3.8	1.1
10	Top-down communication works well.	3.5	0.5	2.7	1.0	2.9	1.1			3.8	1.0
11	Bottom up communications works well.	3.3	0.7	3	0.9	3.2	0.8			3.5	0.9

Table A2

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Oversight provided by the field office											
12	The oversight provided by the field office is timely	3.4	0.5			3.8	0.9	3.7	1.1	3.3	1.3
13	The oversight provided by the field office is high quality.	3.7	0.5			4.0	1.1	3.8	1.1	3.5	1.1
14	The oversight provided by the field office is effective	3.8	0.4			3.8	1.0	3.7	1.1	3.5	1.0
15	The oversight provided by the field office is appropriate	3.4	0.7			3.7	1.0	3.4	1.1	3.5	1.0
16	The oversight provided by the field office is consistent.	3.3	1.0			3.9	1.1	3.3	1.0	3.3	1.2
17	The oversight provided by the field office accurate.	3.8	0.4			4.1	0.9	3.9	0.9	3.3	1.2
18	The oversight provided by the field office proper or the correct information.	3.6	0.5			4.1	0.8	3.5	1.2	3.6	0.9

Table A3

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Supervision provided by the field office											
19	The supervision results provided by the field office timely	3.5	0.5			3.7	1.1	3.5	1.2	3.1	1.3
20	The supervision results provided by the field office are high quality.	4.1	0.6			4.2	0.8	3.7	1.5	3.3	1.1
21	The supervision results provided by the field office are effective	3.6	0.7			3.8	0.9	3.4	1.3	3.3	1.0
22	The supervision results provided by the field office are appropriate	3.9	0.6			3.8	1.0	3.7	1.0	3.3	1.0
23	The supervision results provided by the field office are consistent.	3.5	1.1			3.9	0.9	3.5	1.1	3.3	1.1
24	The supervision results provided by the field office are accurate.	3.9	0.6			4	0.9	3.6	1.1	3.2	1.1
25	The supervision results provided by the field office are proper or the correct information.	3.6	0.5			4	0.9	3.7	1.0	3.4	0.9

Table A4

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Oversight provided to by the Technical Services Division											
26	The Technical Services Division provides us with timely oversight	3.7	0.5	3.7	0.7	3.5	1.1	3.5	1.0	3.6	1.0
27	The Technical Services Division provides us with high quality oversight	3.7	0.5	4.3	0.7	3.6	0.9	3.8	0.9	4.1	0.8
28	The Technical Services Division provides us with effective oversight	3.3	0.9	3.8	0.9	3.3	0.9	3.6	0.8	3.7	0.9
29	The Technical Services Division provides us with appropriate oversight	3.3	0.7	3.6	1.0	3.5	0.9	3.6	0.8	3.9	0.9
30	The Technical Services Division provides us with consistent oversight	3.1	1.2	3.7	0.9	3.2	0.9	3.5	1.0	3.9	1.0
31	The Technical Services Division provides us with accurate oversight	3.4	1.1	4.2	0.8	3.6	0.7	3.7	1.0	4.0	1.0
32	The Technical Services Division provides us with proper or correct information in their oversight	3,0	1.1	4.1	0.9	3.6	0.9	3.8	0.8	4.0	0.8

Table A5

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Supervision results provided to this field office by the Technical Services Division											
33	The Technical Services Division provides us with timely supervision results	3.7	0.9	3.5	0.9	3.4	1.1	3.6	1.0	3.6	1.0
34	The Technical Services Division provides us with high quality supervision results	3.8	1.1	4.2	0.9	3.6	1.0	3.9	0.9	4.1	0.7
35	The Technical Services Division provides us with effective supervision results	3.7	1.0	3.9	0.9	3.4	1.0	3.9	0.7	4.0	0.8
36	The Technical Services Division provides us with appropriate supervision results	3.5	0.9	3.6	1.0	3.4	0.9	3.7	0.9	4.0	0.8
37	The Technical Services Division provides us with consistent supervision results	3	1.1	4.3	0.8	3.3	0.9	3.4	1.1	4.0	0.9
38	The Technical Services Division provides us with accurate supervision results	3.7	1.1	4.3	0.6	3.5	0.8	3.6	0.8	4.0	0.9
39	The Technical Services Division provides us with proper or correct information in their supervision results	3.4	1.0	4.3	0.6	3.5	0.9	3.3	1.1	4.0	0.8

Table A6

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Training provided to this field office by the either the field office or Technical Services Division											
40	The field office or the Technical Services Division provides us with timely training	3.9	0.8	3.8	1.0	3.6	1.2	3.5	1.2	3.6	1.1
41	The field office or the Technical Services Division provides us with high quality training	4.4	0.5	4.4	0.8	4.0	0.8	3.9	0.8	4.1	0.9
42	The field office or the Technical Services Division provides us with effective training	4.3	0.5	4.1	0.8	3.9	0.9	3.7	0.8	4.0	0.9
43	The field office or the Technical Services Division provides us with appropriate training	4.1	0.6	3.8	1.0	3.7	1.0	3.8	0.9	4.0	0.9
44	The field office or the Technical Services Division provides us with consistent training	3.9	0.6	4.2	0.7	3.6	1.0	3.5	1.1	3.9	0.9
45	The field office or the Technical Services Division provides us with accurate training	4.4	0.5	4.4	0.6	3.8	1.0	3.9	1.0	3.9	1.0
46	The field office or the Technical Services Division provides us with proper or correct information in their training	4.3	0.7	4.3	0.6	3.8	0.9	3.9	0.9	4.0	0.9

Table A7

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Responses provided to this field office by the field office or the Technical Services Division											
47	The field office or the Technical Services Division provides us with timely responses	3.9	0.9	3.8	0.7	3.9	0.9	3.7	1.0	3.6	1.0
48	The field office or the Technical Services Division provides us with high quality responses	3.9	0.6	4.2	0.5	3.9	0.8	3.7	1.1	3.9	0.8
49	The field office or the Technical Services Division provides us with effective responses	3.8	0.4	3.9	0.6	3.8	0.9	3.6	0.8	3.6	0.9
50	The field office or the Technical Services Division provides us with appropriate responses	3.7	0.5	3.8	0.6	3.8	0.8	3.6	0.8	3.8	0.9
51	The field office or the Technical Services Division provides us with consistent responses	3.6	0.7	4.1	0.8	3.5	0.9	3.5	1.1	3.8	0.8
52	The field office or the Technical Services Division provides us with accurate responses	3.7	0.7	4.1	0.8	3.5	0.8	3.7	0.8	3.8	1.0
53	The field office or the Technical Services Division provides us with proper or correct information in their responses	3.7	0.7	4.0	0.6	3.7	0.8	3.5	0.9	4.0	0.8

Table A8

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Assistance provided by the field office or the Technical Services Division											
54	The field office or the Technical Services Division provides us with timely assistance	4.0	0.7	4.1	0.7	4.1	0.9	3.6	0.8	3.7	1.1
55	The field office or the Technical Services Division provides us with high quality assistance	4.0	0.5	4.4	0.6	3.9	0.8	3.8	0.8	3.9	0.9
56	The field office or the Technical Services Division provides us with effective assistance	3.9	0.6	4.2	0.6	3.7	0.8	3.6	0.7	3.8	1.0
57	The field office or the Technical Services Division provides us with appropriate assistance	3.8	0.7	4.1	0.6	3.8	0.8	3.7	0.9	3.9	0.9
58	The field office or the Technical Services Division provides us with consistent assistance	3.2	1.1	4.2	0.7	3.6	0.9	3.4	0.9	3.6	1.0
59	The field office or the Technical Services Division provides us with accurate assistance	3.8	0.7	4.4	0.6	3.7	0.8	3.7	0.7	3.8	0.9
60	The field office or the Technical Services Division provides us with proper or correct information in their assistance	3.7	0.7	4.4	0.6	3.8	0.8	3.7	0.9	3.8	0.8

Table A9

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Consistency of oversight and supervision Agency-Wide											
61	Oversight is consistent agency wide.	2.4	0.9	2.6	1.3	3.0	0.9	2.6	1.2	3.2	1.4
62	Oversight is accurate agency wide.	3.0	0.9	3.0	0.9	3.0	0.7	2.8	1.0	3.3	1.1
63	Supervision results is consistent agency wide.	3.1	1.1	2.9	1.1	3.2	0.8	2.8	0.9	3.4	1.1
64	Supervision results is accurate agency wide.	3.4	0.9	3.0	0.9	3.2	0.8	3.1	0.8	3.4	1.0

Table A10

Question No.	Question	DC		KCC		FO MGT		FO NON MGT		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Reviews provided by the Compliance Division											
65	The reviews are useful	4.1	0.6			3.2	1.3	3.5	1.0	3.8	1.0
66	The reviews helps us identify areas were we need to improve	3.9	1.0			3.4	1.2	3.6	1.1	3.9	0.8
67	The review reports identify unimportant issues.	3.4	1.3			3.6	1.2	3.5	1.2	3.7	1.0
68	The reviews makes (mountains out of mole hills)	3.1	1.5			3.5	1.3	3.4	1.1	3.6	1.2
69	The reviews are consistent agency wide.	3.5	1.1			2.9	1.2	4.5	6.7	3.2	1.2
70	The professionals conducting the reviews are consistent in the review process	3.4	0.7			3.1	1.1	3.3	1.0	3.4	1.1
71	The professionals conducting the review are knowledgeable in the processes being reviewed	3.8	0.7			3.2	1.0	3.3	1.0	3.4	1.1

Table A11

Question No.	Question	DC		KCC		FO MGT		FO NON MG		OA	
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Interaction with the customer											
72	We provide services that are useful to the industry customers	4.4	0.7	4.2	0.9	4.6	0.6	4.6	0.5	4.7	0.5
73	I understand industry-s needs	4.0	0.8	3.9	0.8	4.5	0.7	4.2	0.7	4.4	0.7
74	I understand future industry-s needs	3.6	0.8	3.3	0.8	4.1	0.7	3.6	0.8	3.9	0.8
75	Is industry pleased with our results	3.6	0.5	3.7	0.6	3.9	0.8	3.6	0.7	4.0	0.8

Table A12

Question No.	Question	DC	DC	KCC	KC C	FO MGT	FO MG T	FO NON MGT	FO NO N MG T	OA	OA
		Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev	Mean	Std dev
Structure of GIPSA											
76	The current structure of GIPSA is adequate for QA/QC supervision and oversight	3	0.8	3.1	0.9	3.4	1	3.4	1.2	3.2	1.3
77	A central testing laboratory will provide better oversight	2.9	0.6	3.5	1	2.7	1.4	2.8	1.4	3.2	1.5
78	This site providing timely oversight to meet the needs of Official Agencies and industry	3.3	0.5	3.8	0.6	3.5	1.2	3.5	1	3.5	0.9
79	The oversight methodology is adequate to meet the needs of the industry	2.9	0.8	3.4	0.8	3.5	1.1	3.6	0.9	3.1	1.1

**APPENDIX B
BOX PLOTS OF SURVEY DATA**

Figure B1 Plot of Questions 1,2,3,and 4 by location

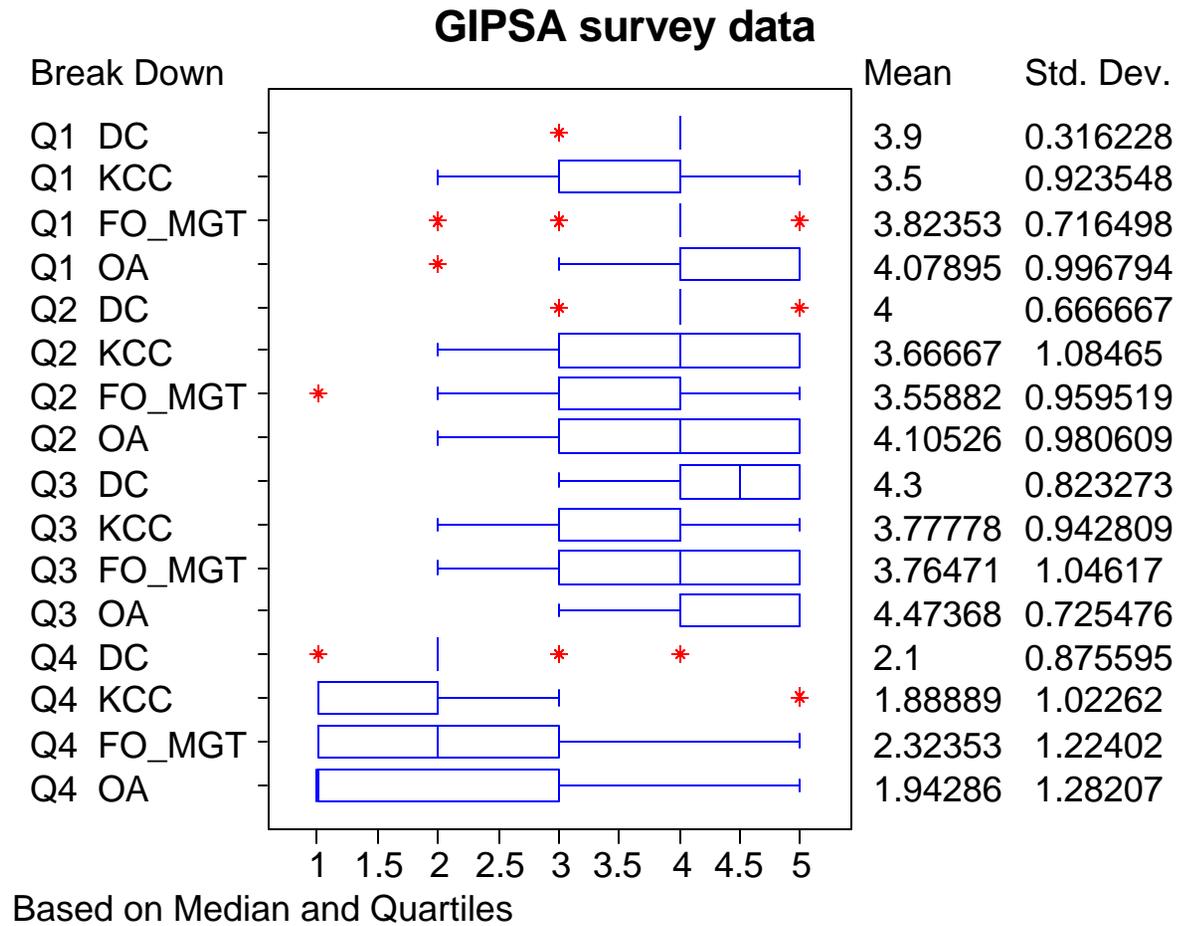


Figure B2 Plot of Questions 5,6,7,and 8 by location

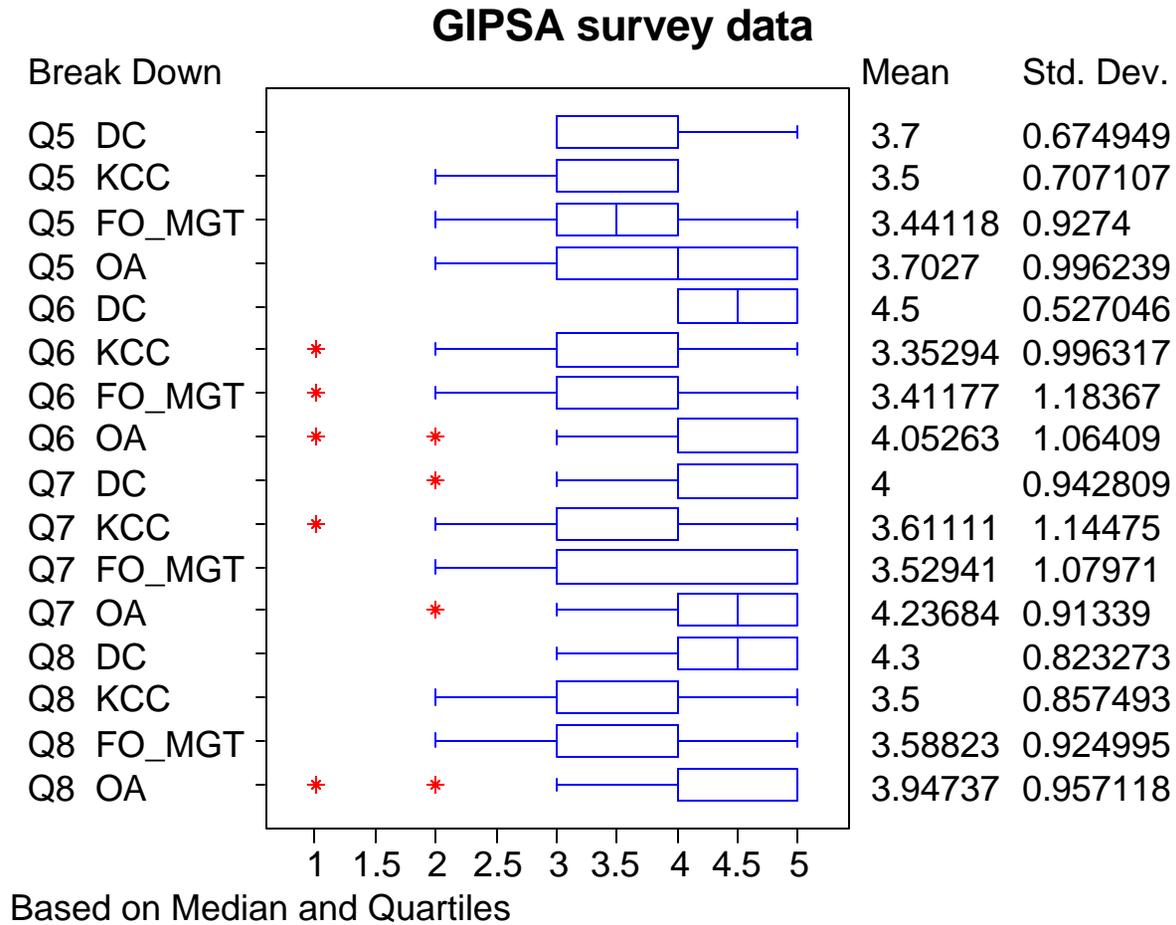


Figure B3 Plot of Questions 9, 10, and 11 by location

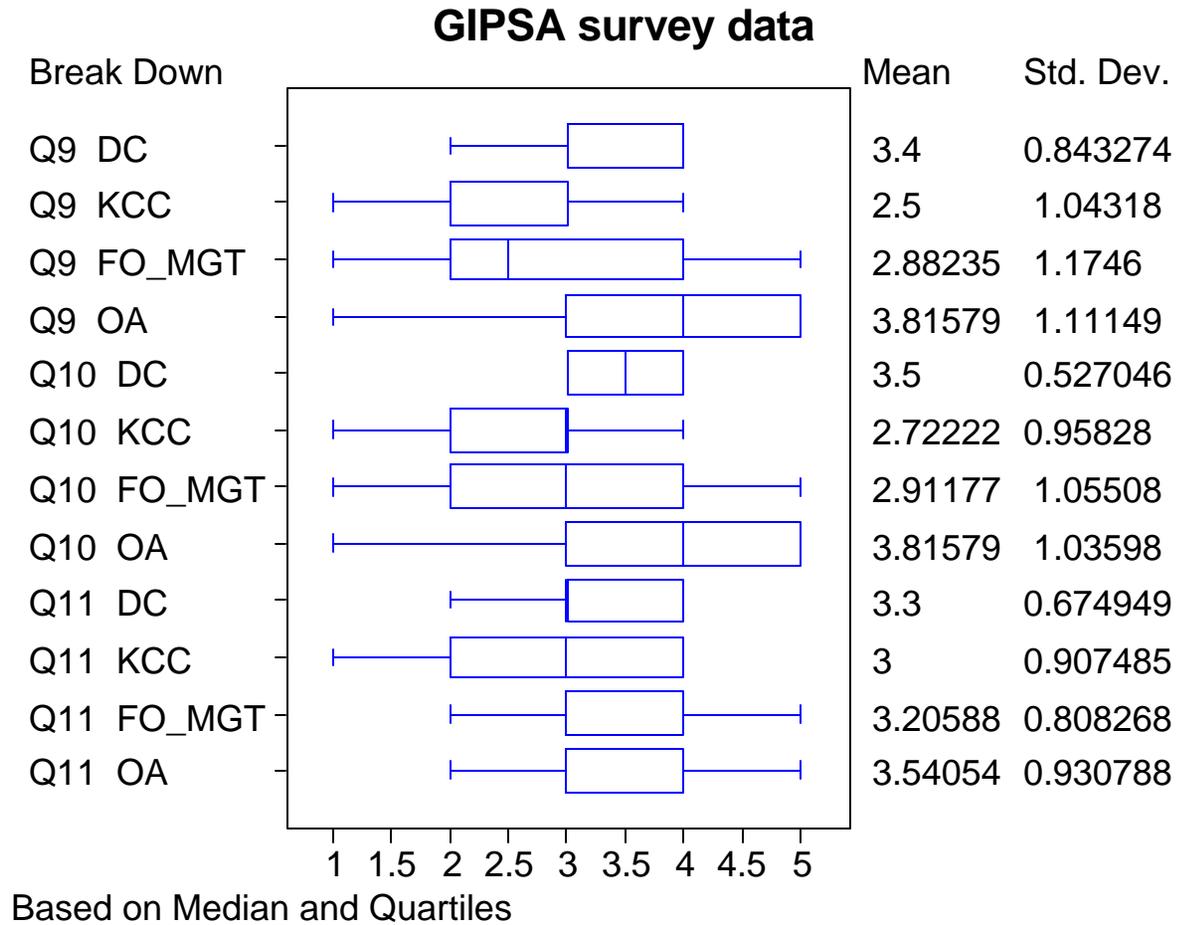


Figure B4 Plot of Questions 12, 13, 14, and 15 by location

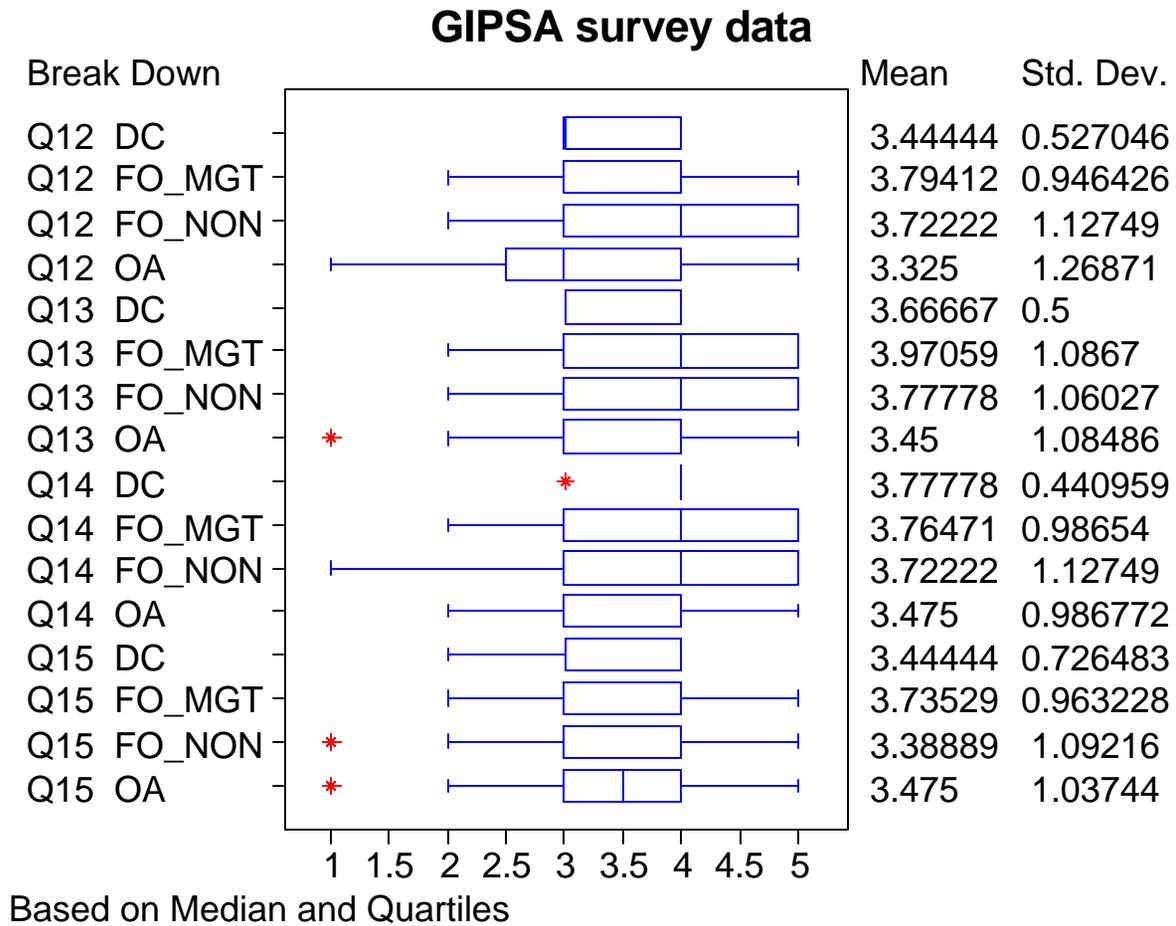


Figure B5 Plot of Questions 16, 17, and 18 by location

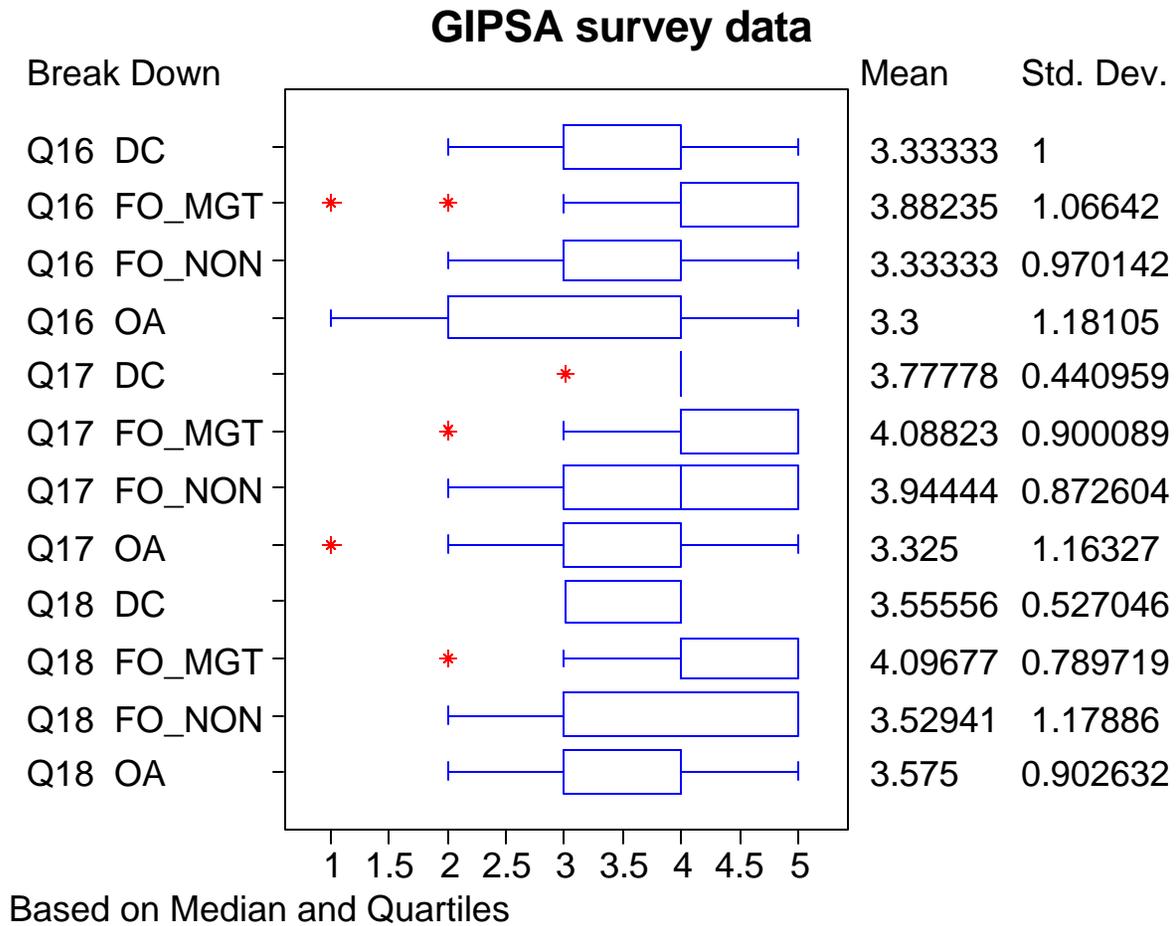


Figure B6 Plot of Questions 19, 20,21, and 22 by location

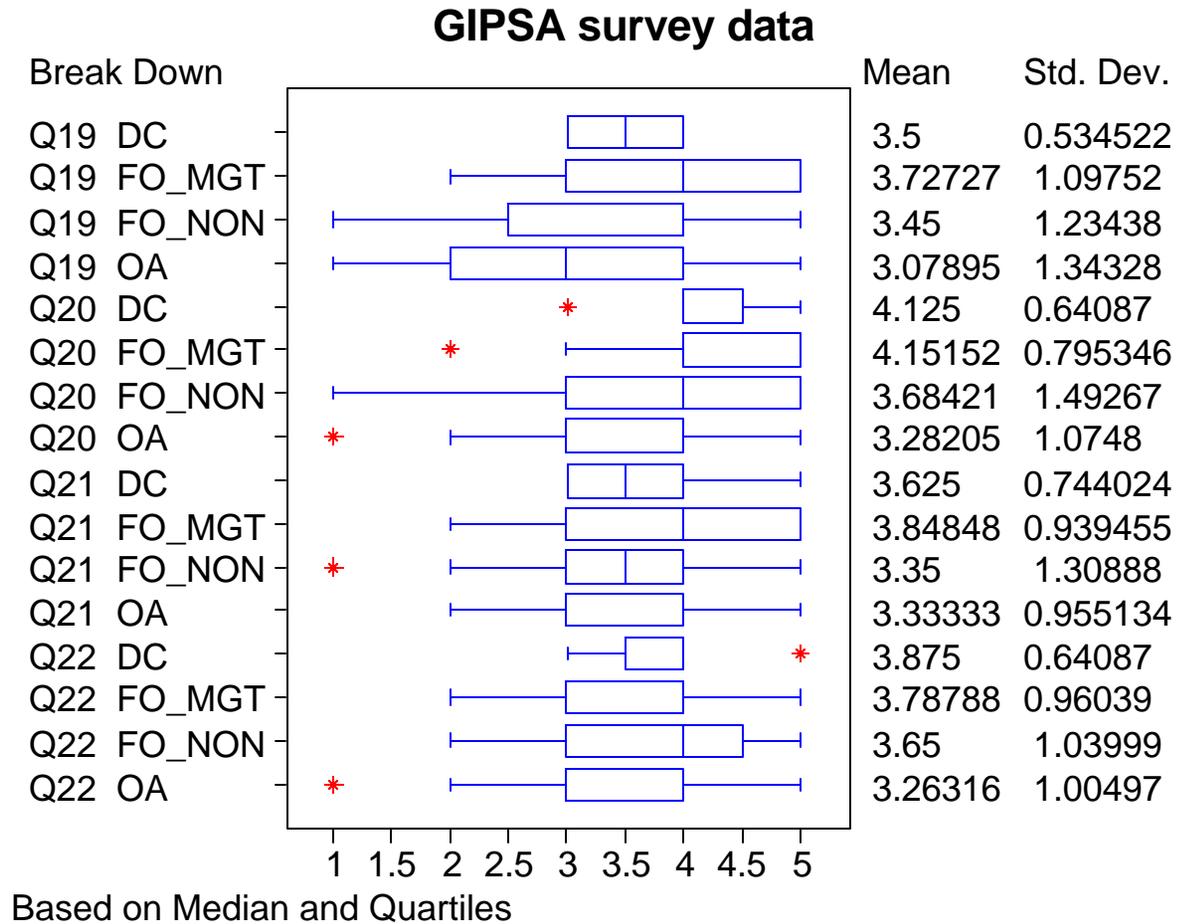


Figure B7 Plot of Questions 23,24,and 25 by location

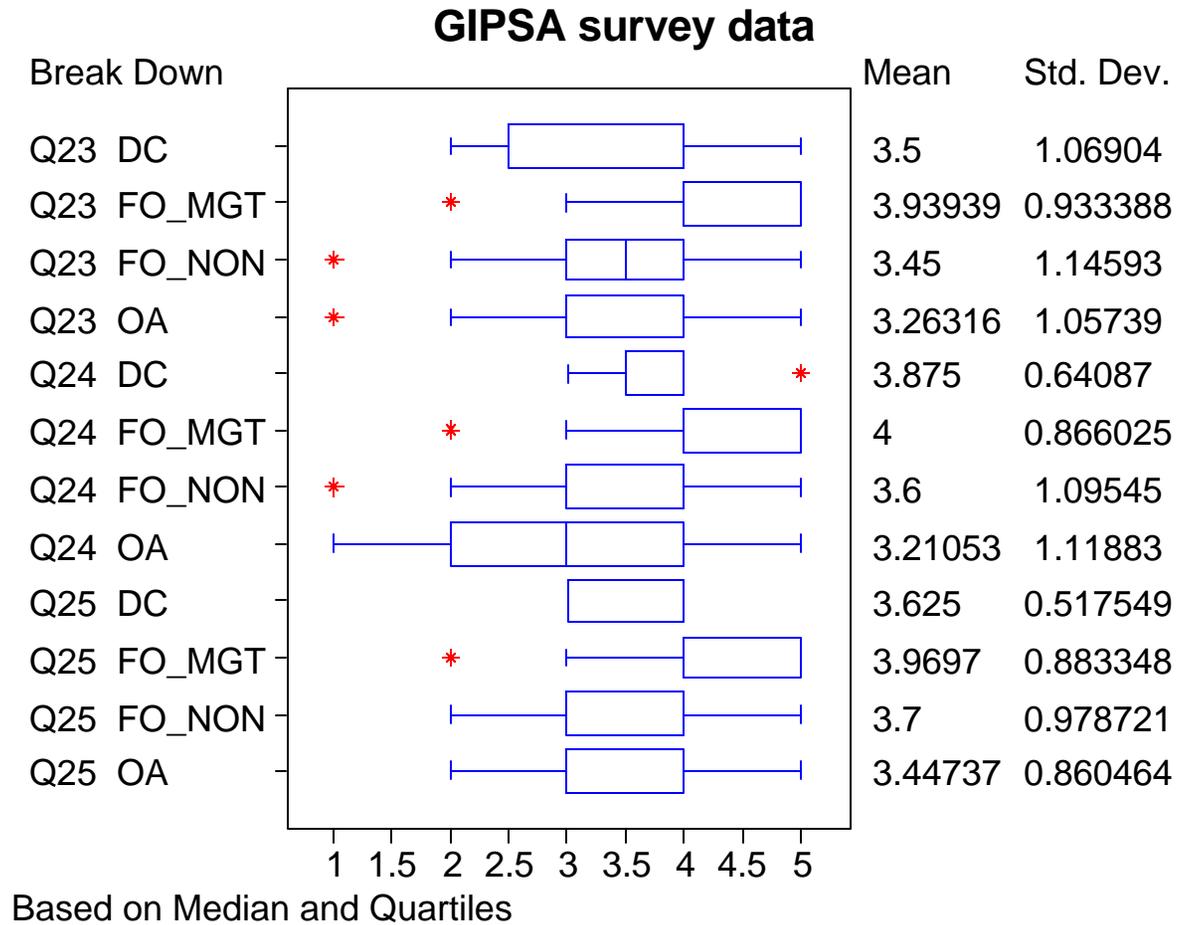


Figure B8 Plot of Questions 26, 27, 28, and 29 by location

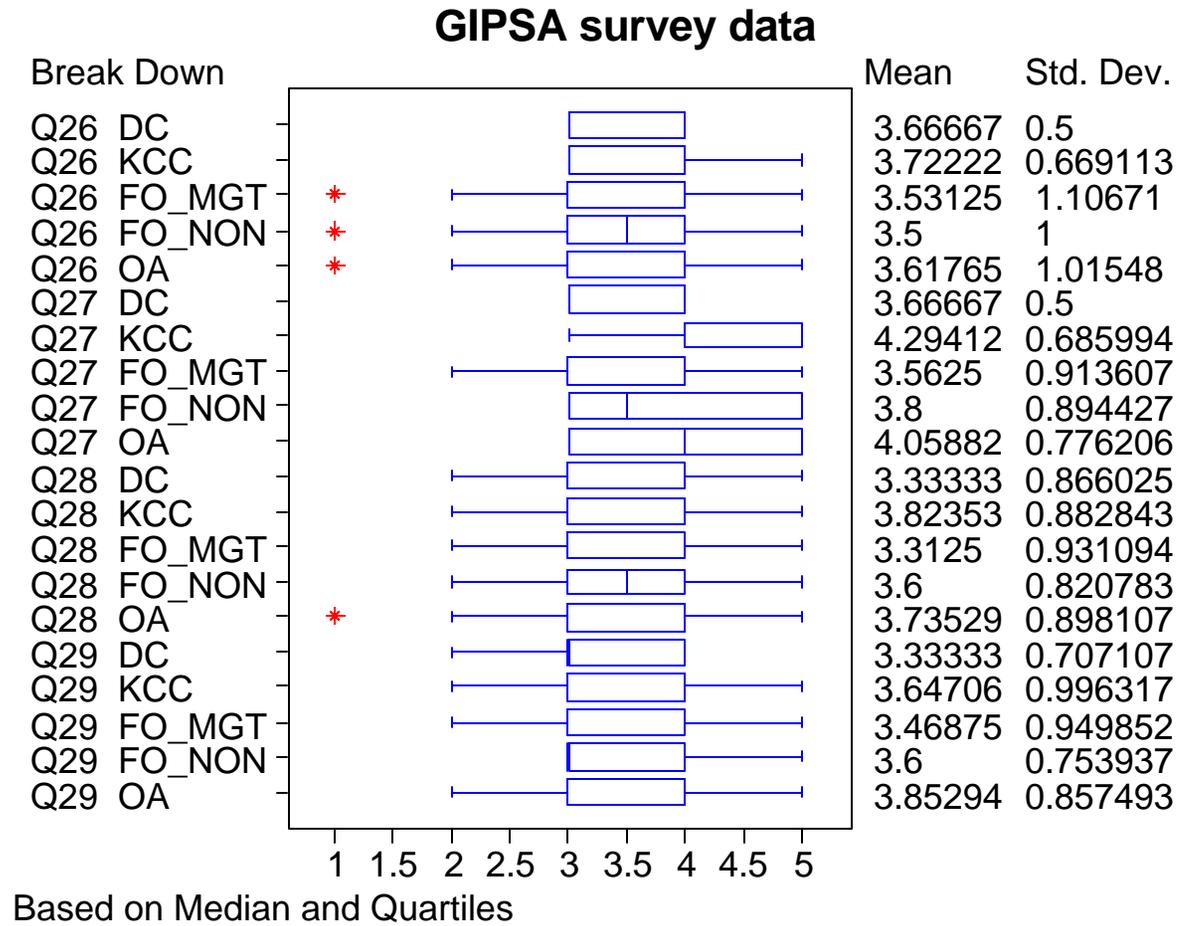


Figure B9 Plot of Questions 30,31,and 32 by location

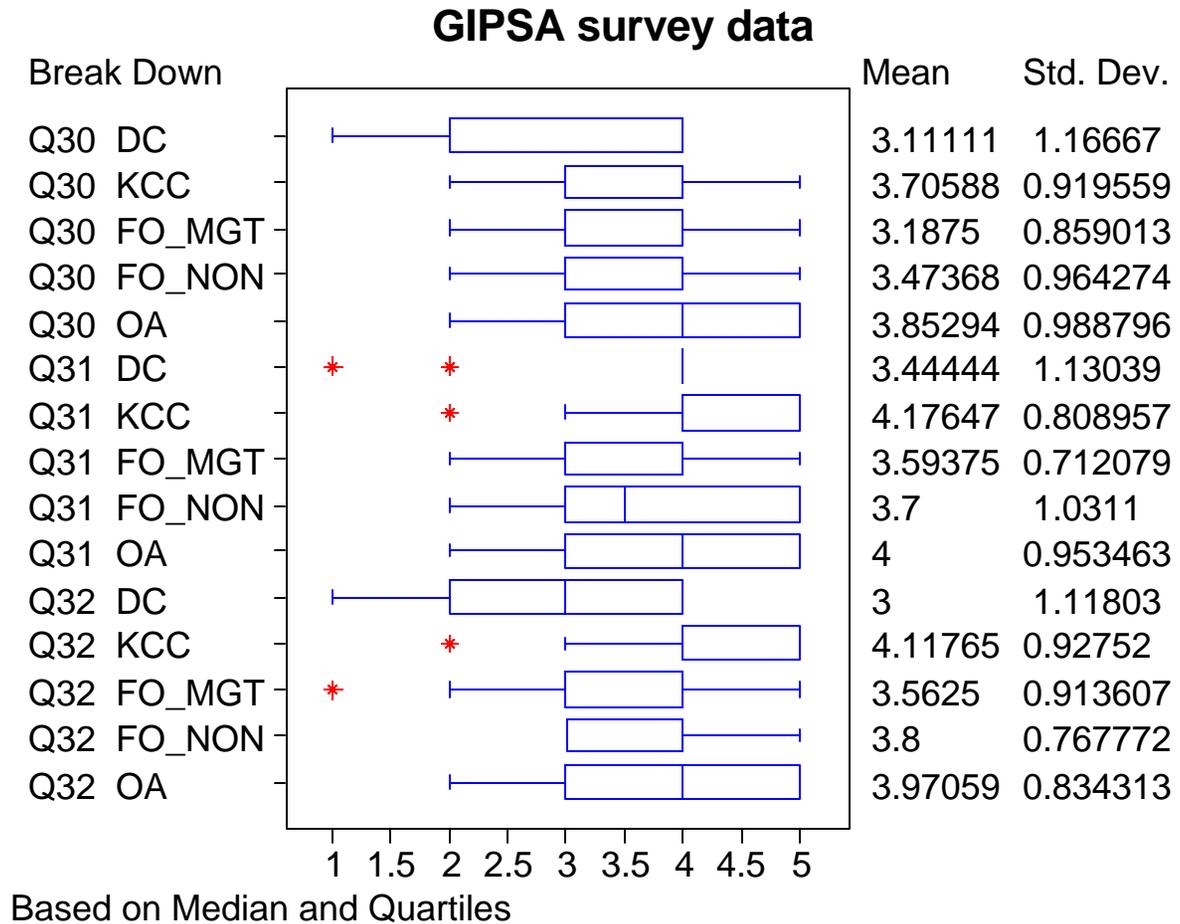


Figure B10 Plot of Questions 33, 34, 35, and 36 by location

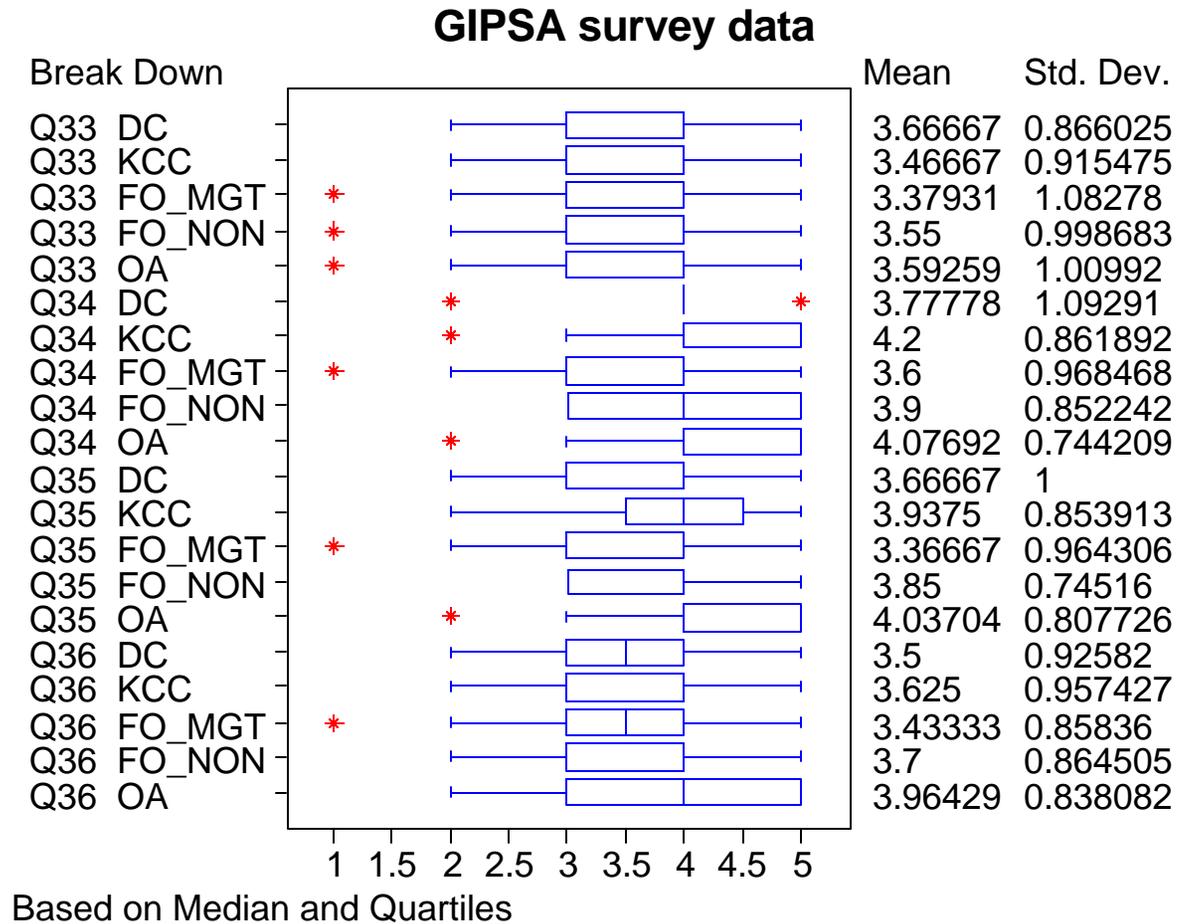


Figure B11 Plot of Questions 27, 28, and 39 by location

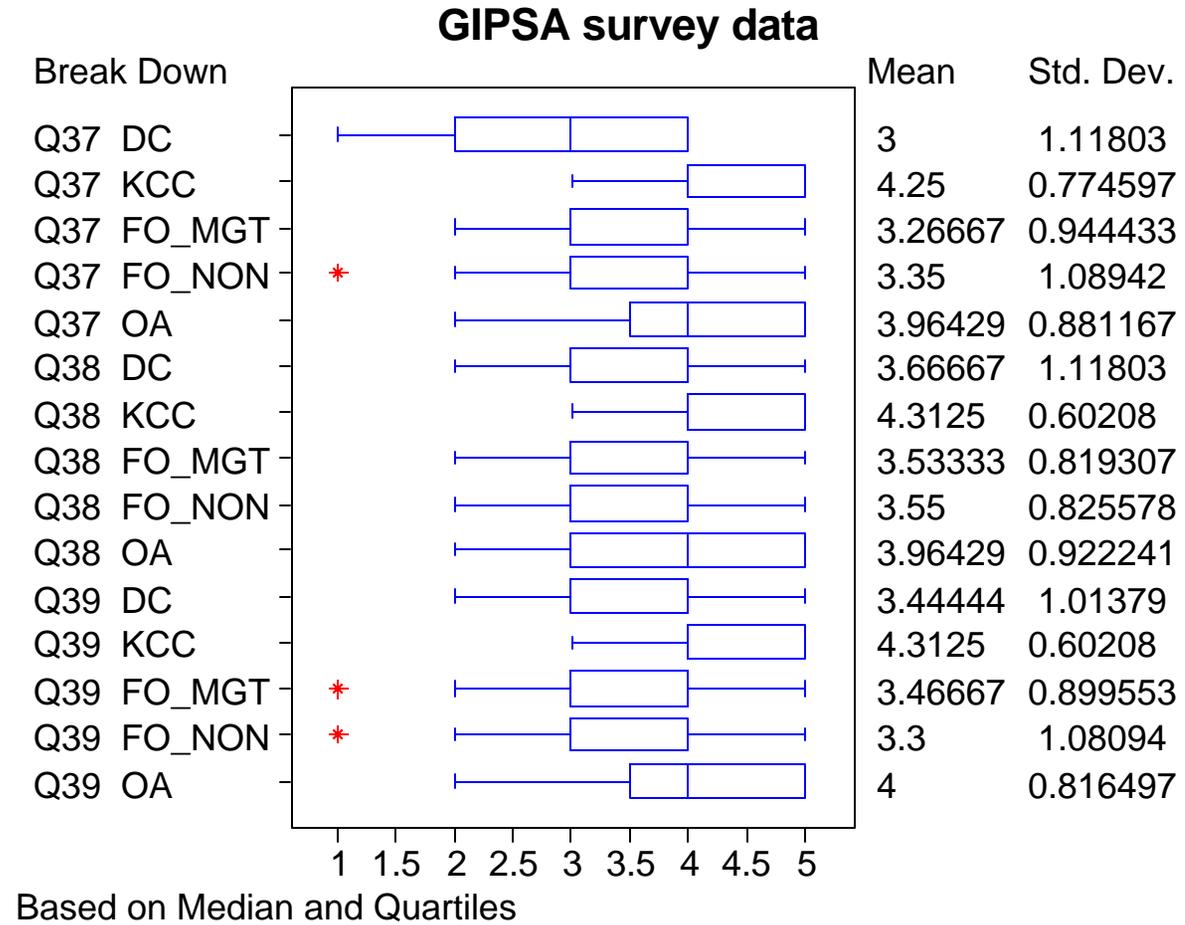


Figure B12 Plot of Questions 40, 412, and 43 by location

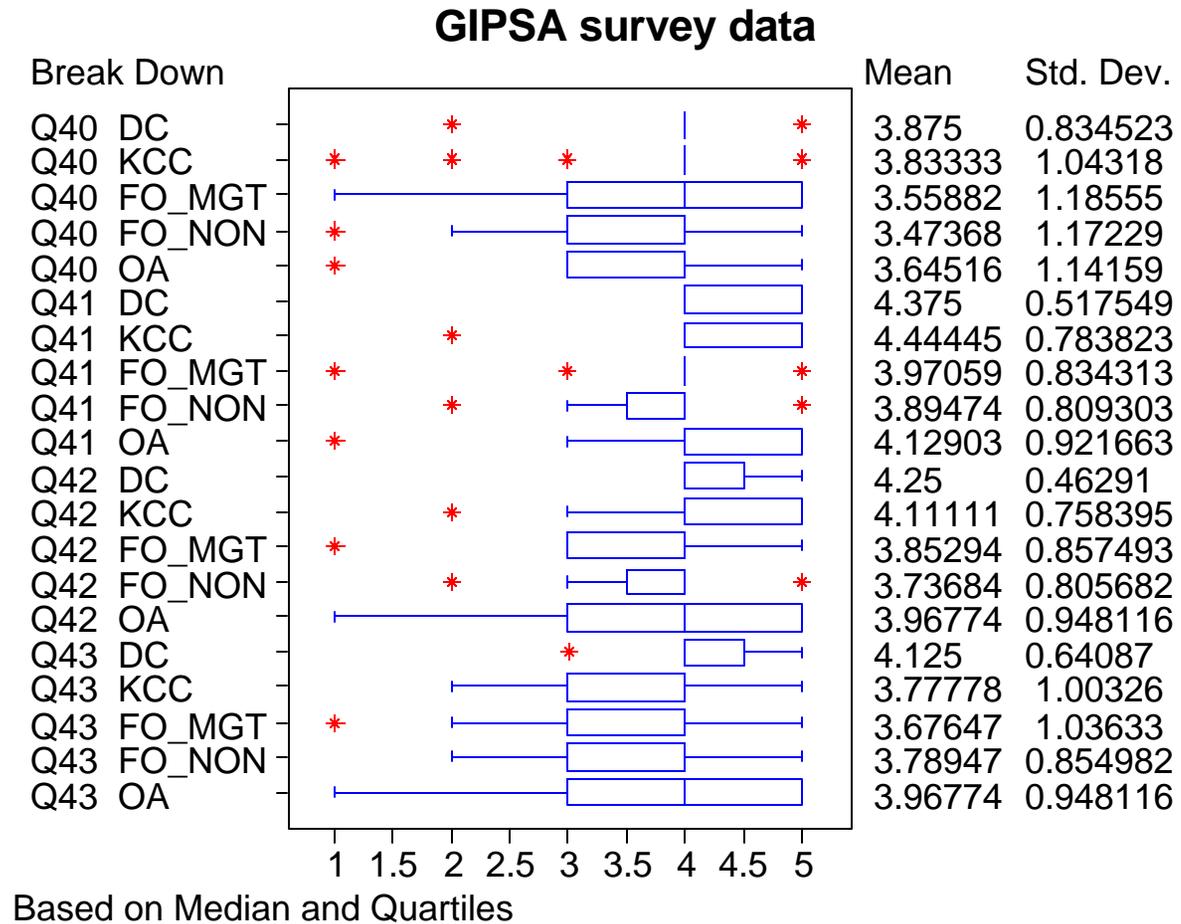


Figure B13 Plot of Questions 44, 45, and 46 by location

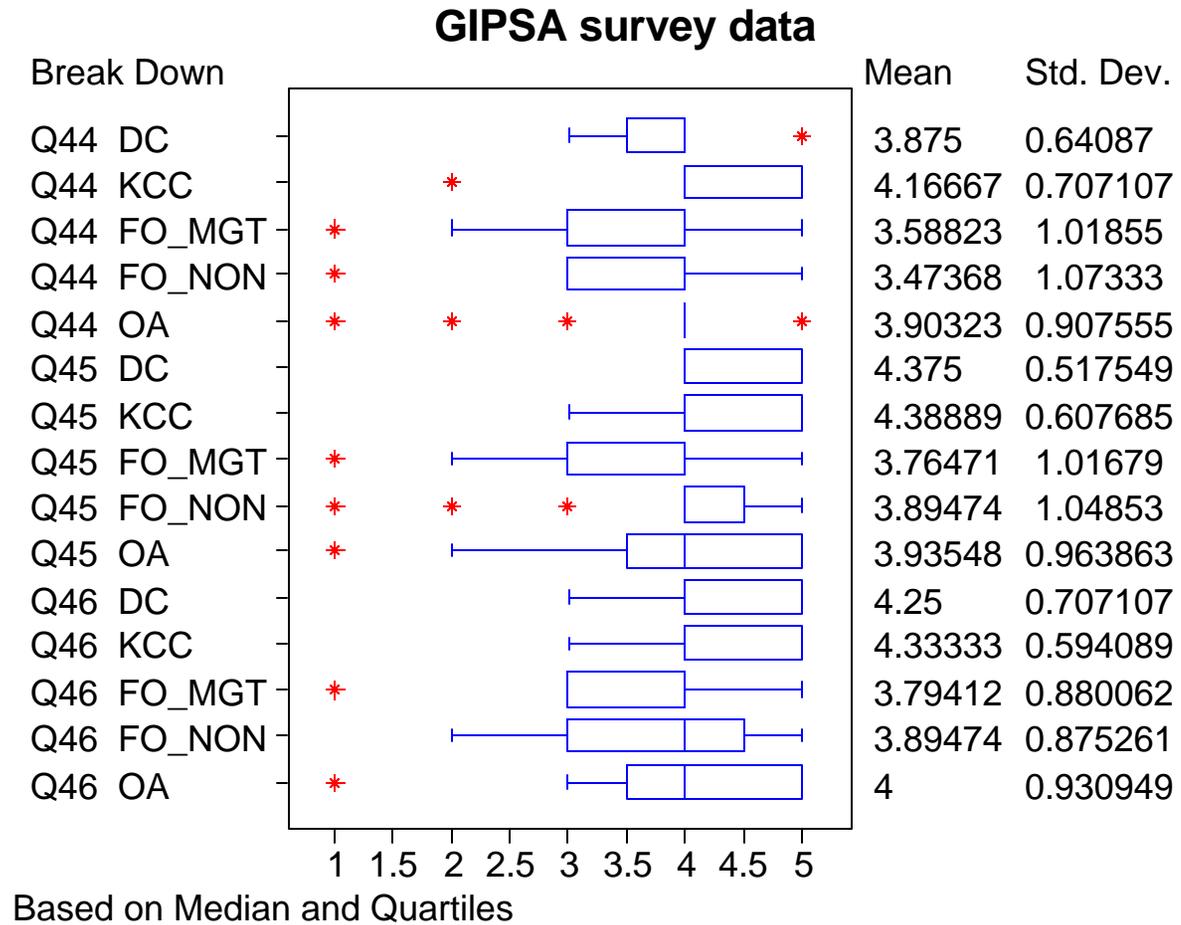


Figure B14 Plot of Questions 47, 48, 49, and 50 by location

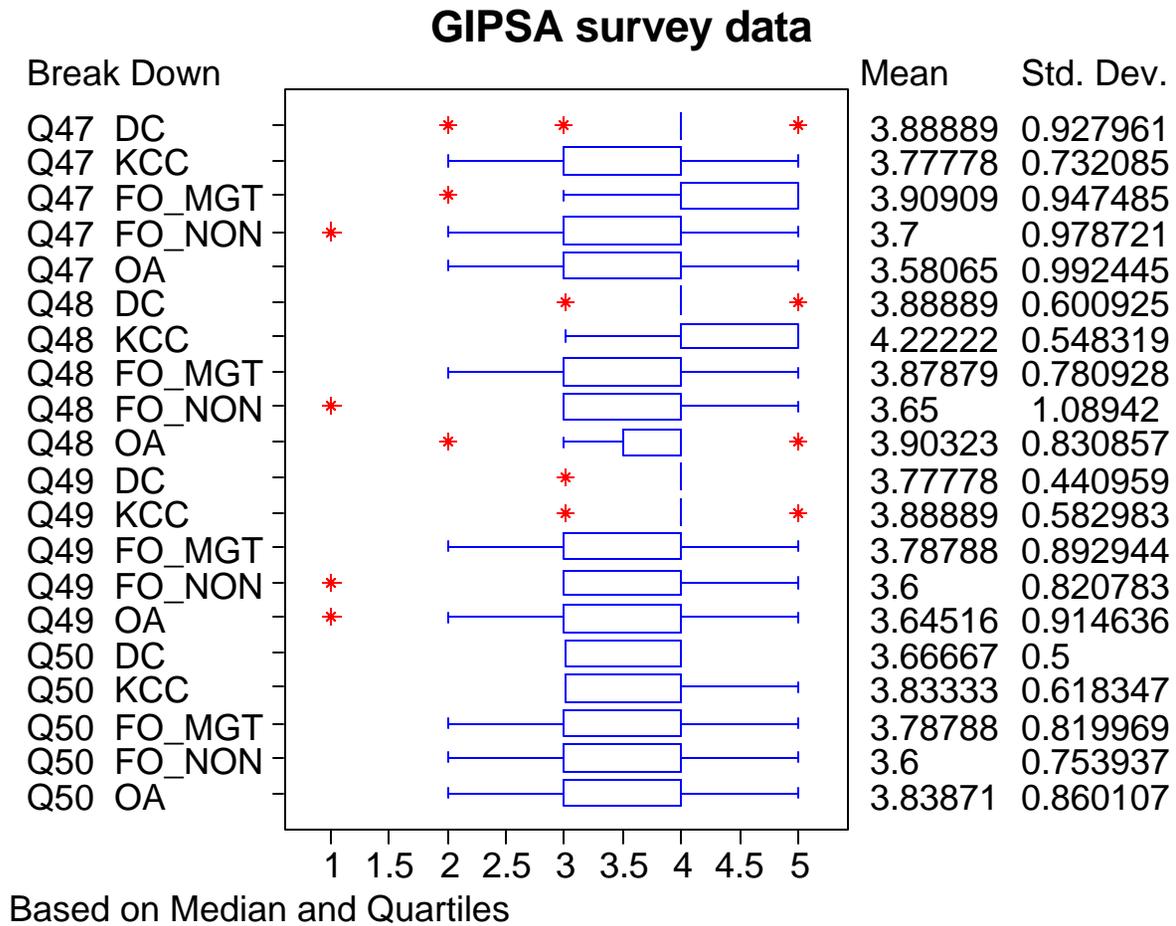


Figure B15 Plot of Questions 51, 52, and 53 by location

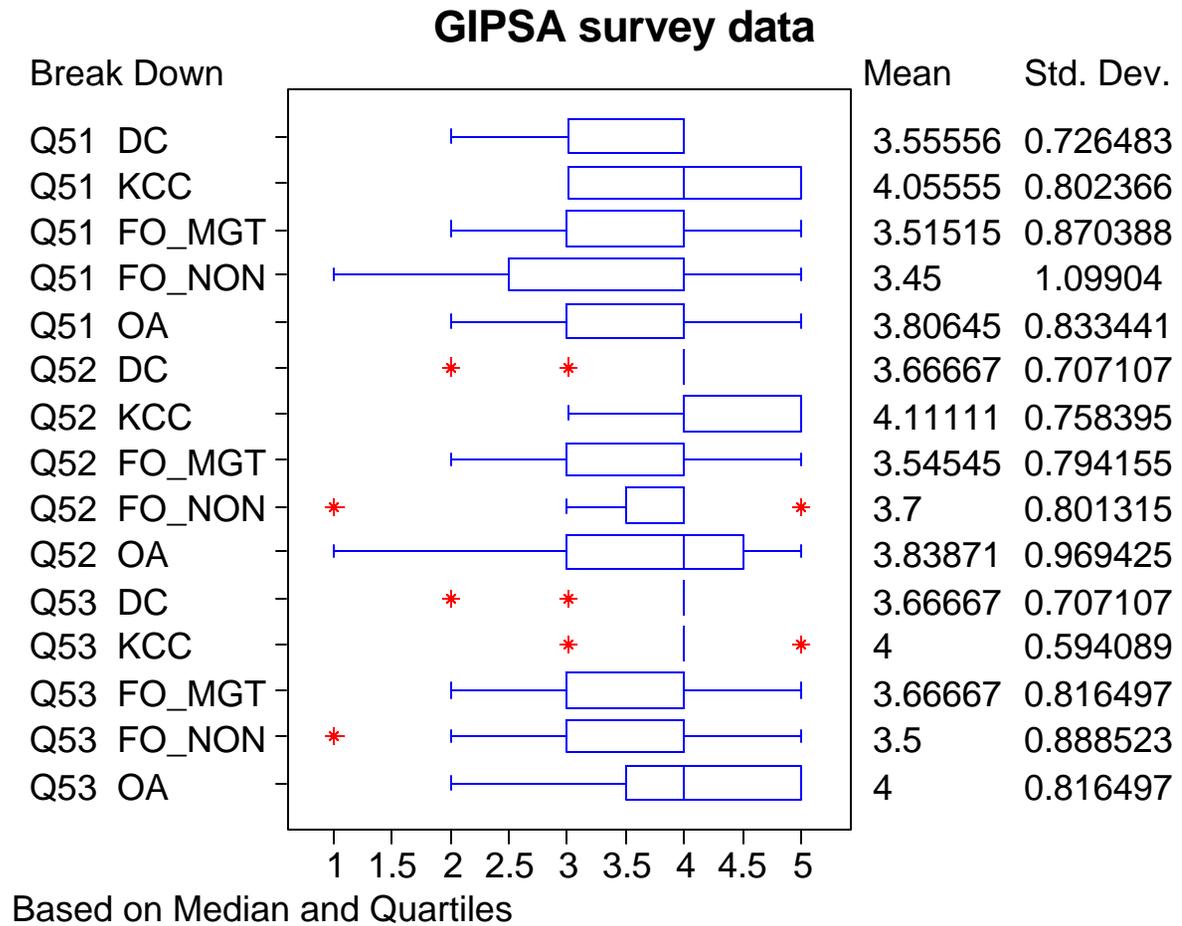


Figure B16 Plot of Questions 54, 55, 56, and 57 by location

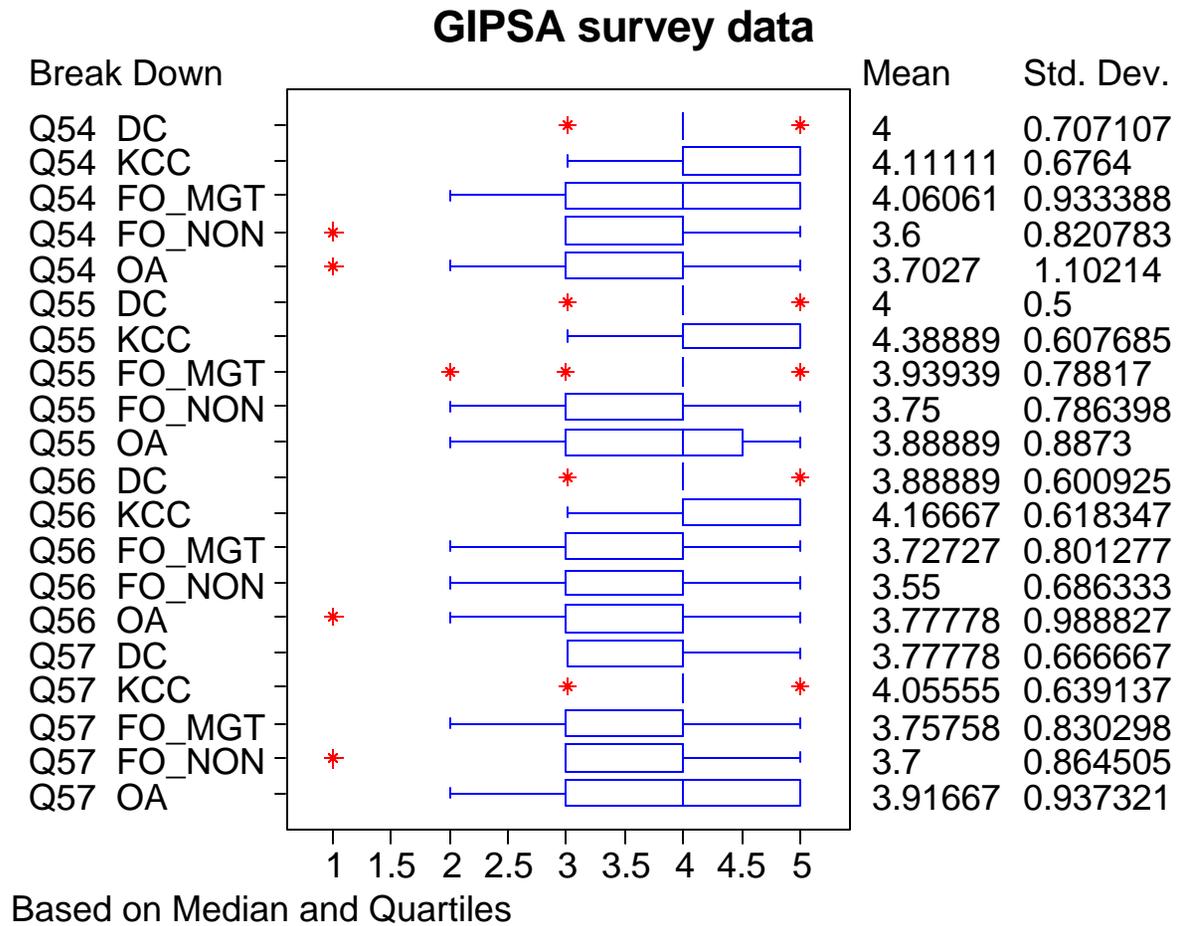


Figure B17 Plot of Questions 58, 59, and 60 by location

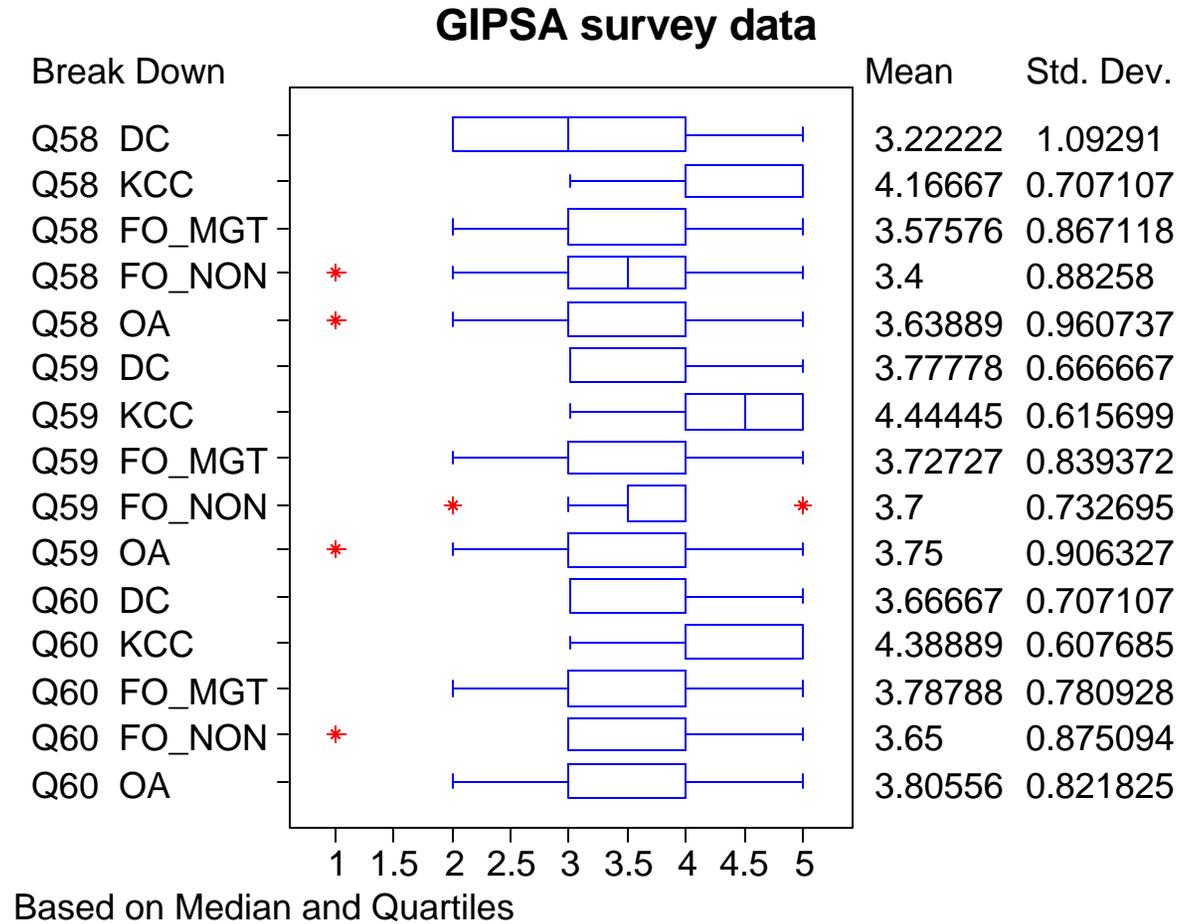


Figure B18 Plot of Questions 61, 62, 63, and 64 by location

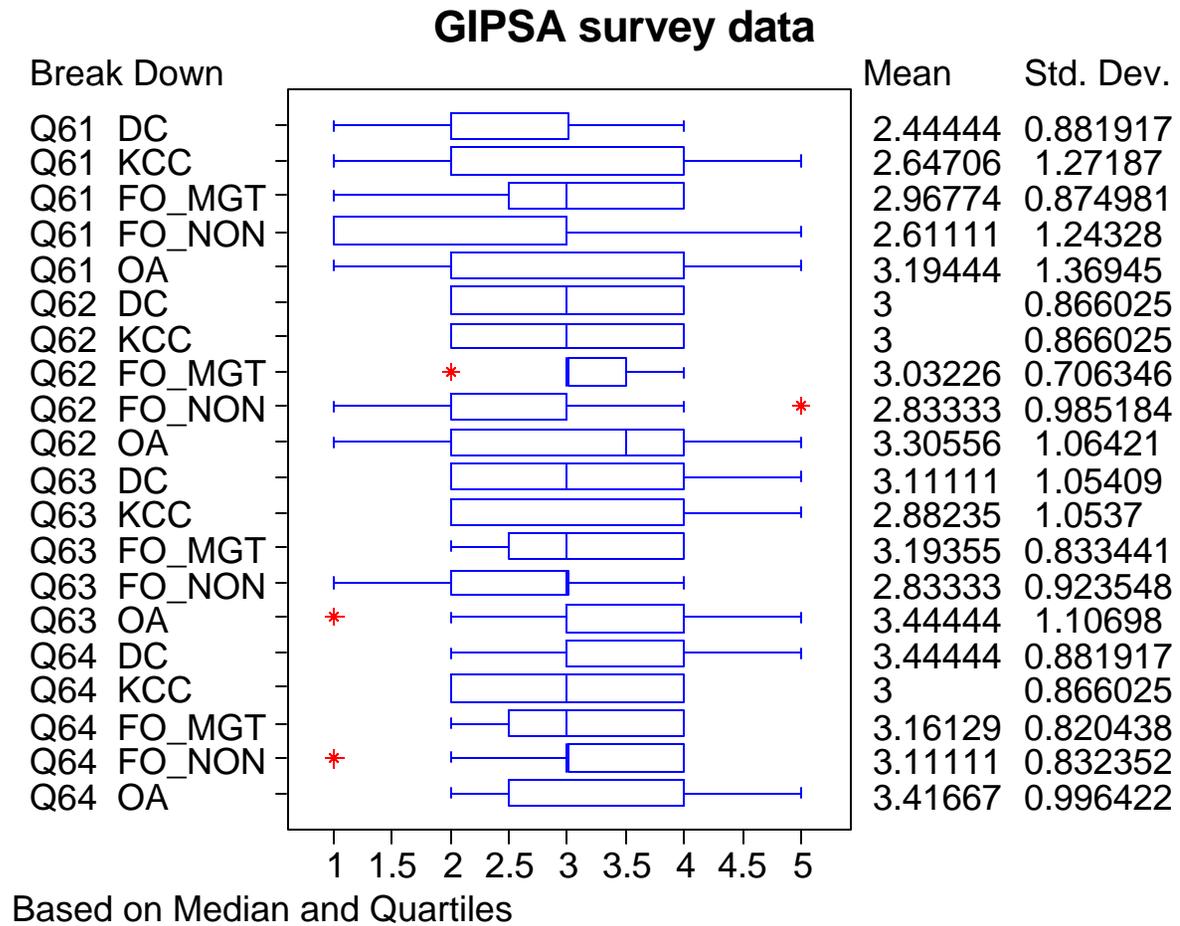


Figure B19 Plot of Questions 65, 66, 67, and 68 by location

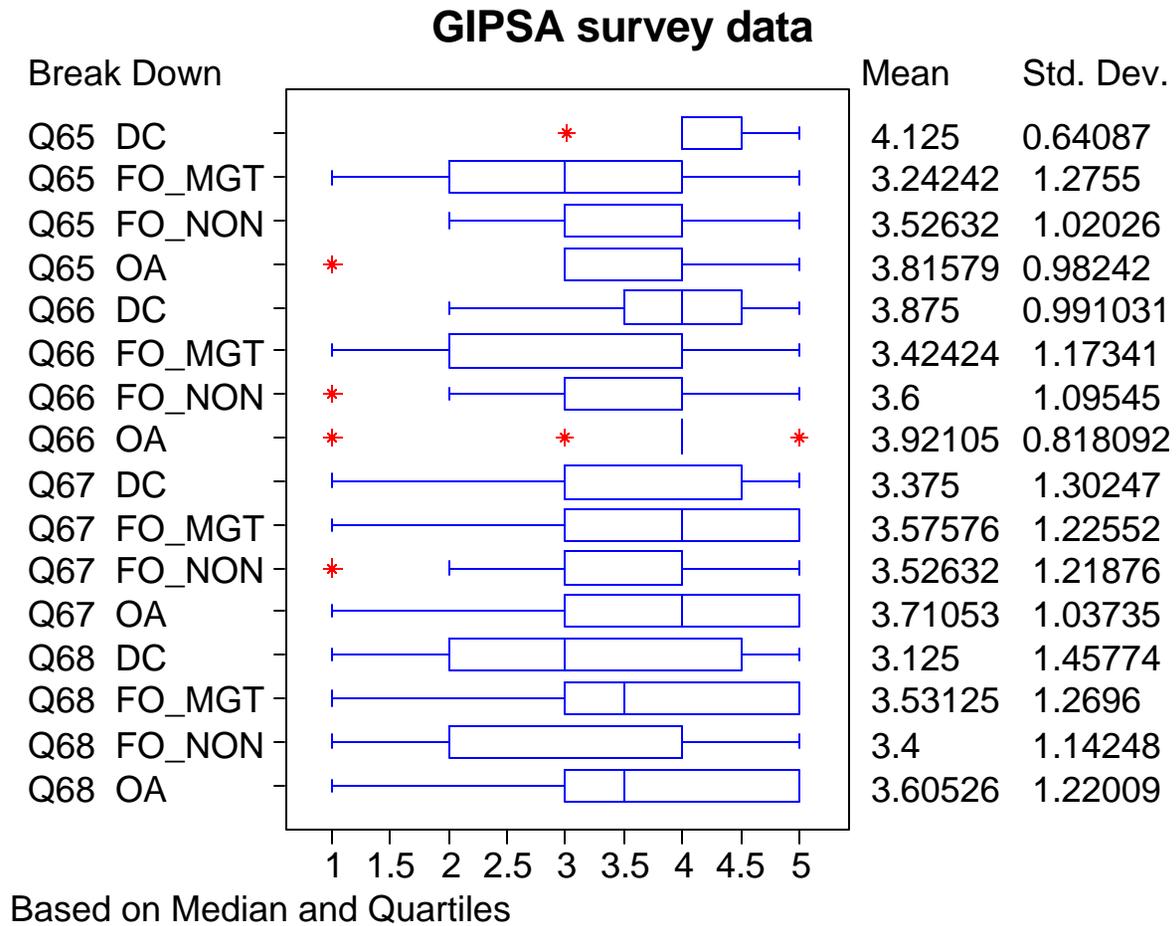


Figure B20 Plot of Questions 69, 70, and 71 by location

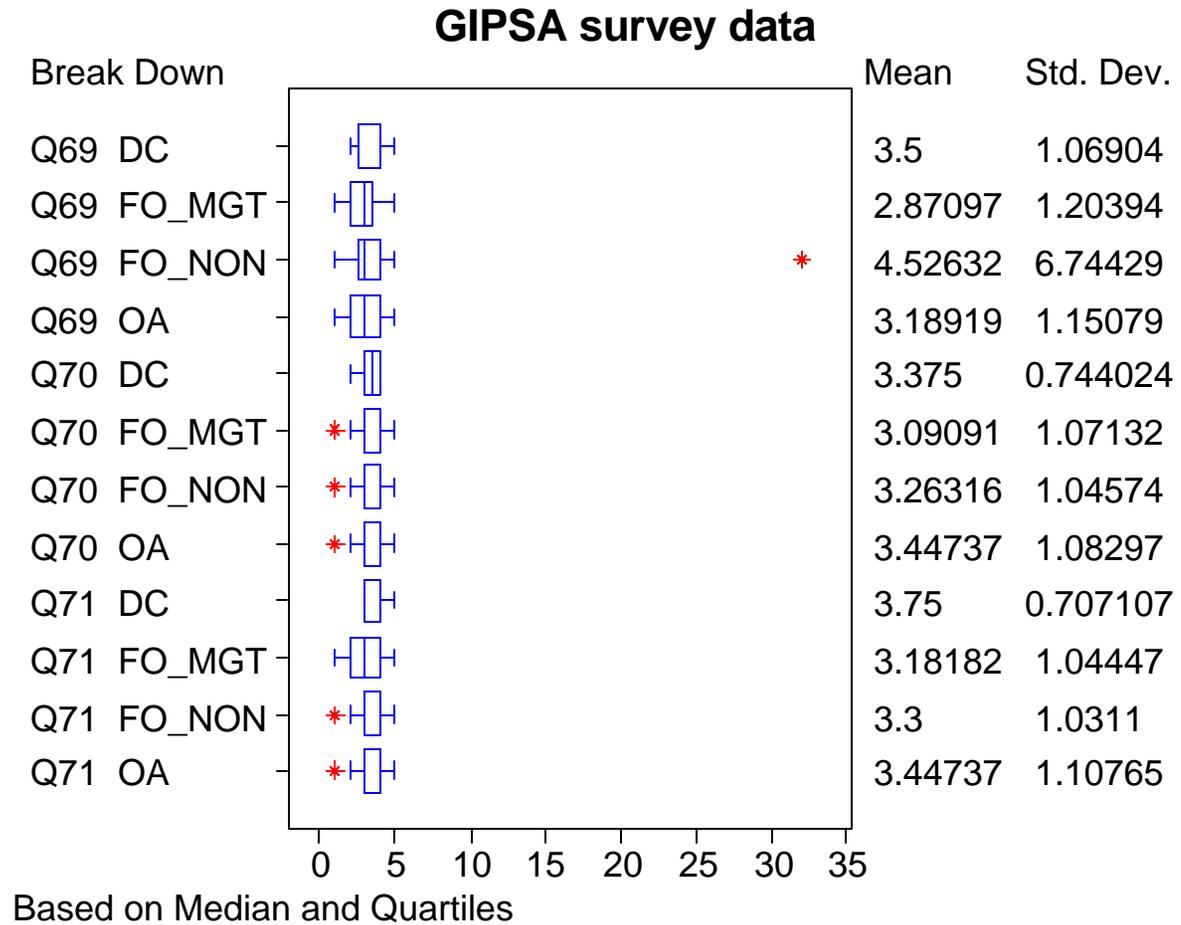


Figure B21 Plot of Questions 72, 73, 74, and 75 by location

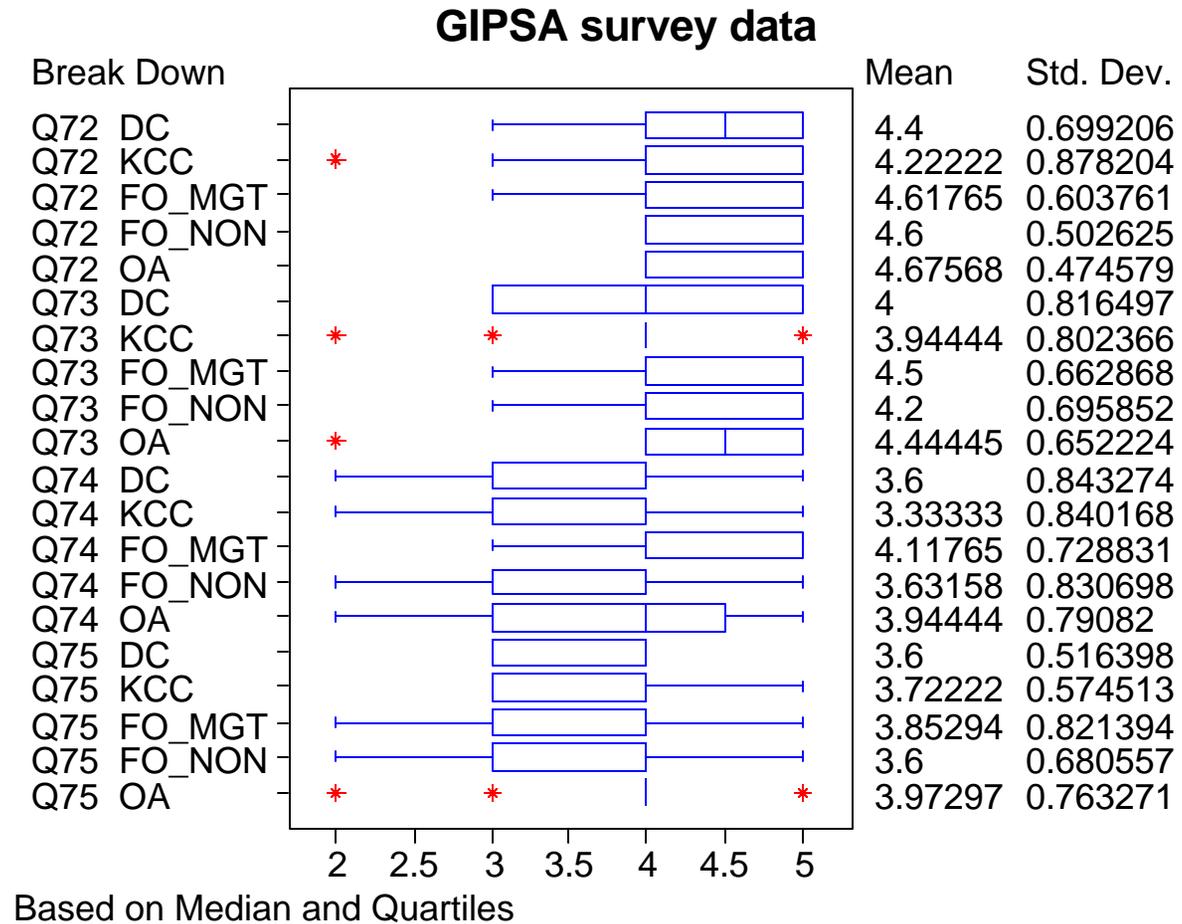
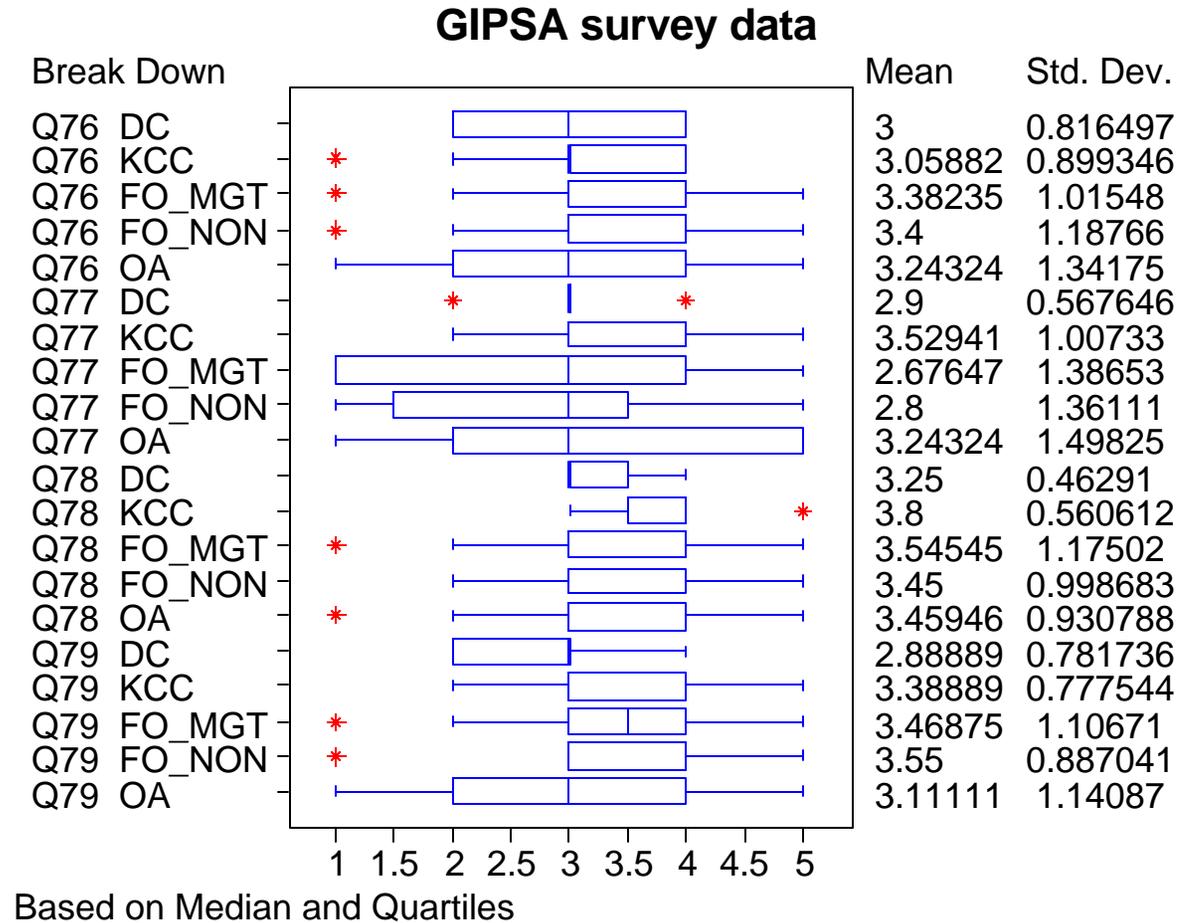


Figure B22 Plot of Questions 76, 77, 78, and 79 by location



APPENDIX C SURVEY COMMENTS

Care must be used in interpreting comments. Not all people who responded to the survey commented. Therefore it can be assumed that those who wrote comments had a strong opinion.

General Comments

- ! Be able to provide data electronically
- ! Take a page out of Ayer's book – ask – How are we doing?
- ! Ask industry – What do they need?
- ! If we do not work efficiently, we will lose more house grades
- ! Need to do commercial (samples) in real time
- ! GIPSA has a “know it all” attitude. They know the answers to the questions even before the questions are asked.
- ! Early alert can be proactive
- ! Anticipate quality problems
- ! Improve communication between parties. Know what others are doing.
- ! Communication with employees in the field is limited.
- ! We only look at the needs of exporters. We do not look at the needs of the foreign buyers
- ! Procedures must be followed consistently
- ! Provide better tools to online inspectors to help monitor the accuracy and the consistency of results
- ! Everyone must understand their role
- ! Methodology is ok – Execution is the problem
- ! GIPSA needs to eliminate subjective grading factors
- ! GIPSA needs to concentrate on oversight and supervision
- ! Every time I've requested an answer, it's been quick, definitive and helpful. Usually the same day
- ! You have to wait for results if a QAS is on detail
- ! Need to increase industry outreach
- ! Grain industry has lost confidence in our ability to give correct results on subjective factors. Need to give consistent results on subjective factors
- ! I understand future industry needs, but I am unable to meet these needs with current equipment and regulations.
- ! Greater emphasis on value-added elements
- ! More funds would be better
- ! Improve communications
- ! There are times when you wait several days for an answer
- ! Sometimes we wait several days to hear back on results especially if the separation goes to the field office then to the BAR, then back to the field office, finally back to the agency
- ! Too timely going through field office and BAR
- ! When an error is made (on the part of the field office), it is not corrected in their paperwork supervision

BAR

- ! Everything that is (done by the BAR) is done by an actual vote, so depending on who is present, that affects the answer
- ! Individuals on the BAR are good at what they do
- ! BAR provides us with timely results. Other areas of the Tech Center are not as timely
- ! Would like to see BAR moved in the area of monitoring nationally
- ! Be able to show accuracy and consistency of individual BAR members so the anchor of the can be proven stable.
- ! Need to bring the BAR under field operations.

TSD

- ! TSD helps promote accuracy with inherent constraints of the process
- ! TSD does not oversee FO.
- ! TSD is too big. They don't respond – They say they are too busy or do not have enough people.

Field Office

- ! Some field offices are stronger than others.
- ! The field office is understaffed and lacking money to travel
- ! There seems to be considerable difference between field offices. Some are doing the bare minimum while others are proactive and trying to promote the official inspection
- ! Field Office – They have real problems with odors, and damaged separations are inconsistent
- ! FO is understaffed
- ! If the FO would get more time to visit the Agencies one-on-one, it would help with the quality and consistency of the Agencies' programs
- ! Some of the field offices are effective, and others are minimal
- ! The field offices need to visit the agencies more often.

Compliance

- ! I have mixed views on Compliance Division reviews because they are normally announced.
- ! Compliance – The reviews are positive when they help us to identify areas that need improving
- ! Sometimes it seems as if the reviewers must keep looking until they find one or two items (small)
- ! Compliance – Overall reviews are consistent and very helpful
- ! Compliance – Improve the field office and have them do more reviews of the Agencies
- ! Compliance – Too much focus on areas that do not affect the quality of service
- ! Compliance reviews are extremely important to monitor the integrity and accuracy of the official function monitoring in the 12 years I have been here.

Structure

- ! Some control of local plant from headquarters because some are too lenient, and others are too flexible
- ! Go back to the structure prior to 1976.
- ! Combine warehousing with OA work.
- ! Assistance provided by the FO or TSD – Are you kidding?
- ! Current field office and QAS system promotes wide variation and consistency of the system.
- ! Central Lab – with QAS station in the field
- ! Oversight provided by field office is good.
- ! Centralization would improve some types of tests
- ! What this (field) office does can be done more effectively by a central lab
- ! I do not agree with doing away with the field office program
- ! Preliminary structure for GIPSA supervision, oversight – Primarily designed to generate revenue not quality. As a result there is a decline in service.
- ! Oversight reviews are effective.
- ! I do not believe a central lab will provide oversight with today's technologies
- ! If ACG were taken to a central location to sit and grade samples the whole day , their communications with the real world would be lost
- ! Retain the current QA/QC program.
- ! A central lab with over-the-shoulder supervision of GIPSA grading by TSD personnel will correct the subjective factor problem

Training

- ! Training is of high quality especially when the field office works with the TSD
- ! Training is not on a timely basis
- ! Training could be improved.
- ! Training provided by BAR is good.
- ! Training is left up to the field office.
- ! I feel more training and assistance are necessary

Oversight and Supervision

- ! Posting of data electronically does little good if supervision is not timely
- ! Supervision should be consistent and equal.
- ! Oversight is not consistent Agency to Agency
- ! Timeliness of oversight
- ! Supervision – Move to central office, one person to talk to that can give timely answers
- ! More onsite supervision - Relying on mailed separation can take too much time. We need more timely interaction.
- ! Supervision – more hands-on approach is needed